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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 21 1996

Carl Everett, Esq.
Saul, Ewing, Remick & Saul
3800 Centre Square West
Philadelphia, PA 19102

Guy Johnson, Esq.
Senior Counsel
Legal Environment Group
D-8070-1
1007 Market St.
Wilmington, DE 19898

Re: Spectron, Inc. Site- RI/FS AOC

Dear Mr. Everett and Mr. Johnson:

Enclosed is a true and correct copy of the fully executed RI/FS AOC for the Spectron, Inc. Site. You have indicated that you will take charge of distributing the Order to all the Galaxy/Spectron Steering Committee Group that signed the Order. The effective date of the Order, as set forth in Sec. XXVIII, shall be three working days from the date of this letter; May 24, 1996. As we discussed, please note that EPA made the following changes:

1. Sec. XX. C., 2nd sentence: EPA deleted the words "from that date" and inserted "thirty (30) days after receipt of the above-referenced summary report".
2. Sec. XXI.D. 1-4: EPA deleted these paragraphs because contribution protection is addressed in Sec. XXX.
3. EPA made appropriate changes to the index.
4. Appendix A has been revised pursuant to our discussions.

Please contact me at (215) 566-2648 should you have any questions.

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Sincerely yours,

Lydia Isaacs

Lydia Isaacs
Senior Assistant Regional Counsel

cc: Randy Sturgeon (3HW21)
Mike Parr

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

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IN THE MATTER OF:

Spectron, Inc. Site
Elkton, Maryland

Galaxy/Spectron Group

Respondents

Proceeding under Sections 104
and 122(a) of the Comprehensive
Environmental Response,
Compensation, and Liability Act
of 1980, as amended, 42 U.S.C.
§§ 9604 and 9622(a)

Docket No. III-96-15-DC

ADMINISTRATIVE ORDER ON CONSENT
FOR REMEDIAL INVESTIGATION/FEASIBILITY STUDY

AR300003

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LIST OF APPENDICES

APPENDIX A LIST OF RESPONDENTS

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Spectron, Inc. Site
Elkton, Maryland

Galaxy/Spectron Group

Proceeding under Sections 104 and 122(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9604 and 9622(a)

[illegible]

The parties to this Administrative Order on Consent ["Consent Order"], members of the Galaxy/Spectron Group ["Respondents"] and the U.S. Environmental Protection Agency ["EPA"], have agreed to the issuance of this Consent Order, and the Respondents agree to undertake all actions required by this Consent Order. The Respondents are those parties listed in Appendix A. This Consent Order concerns the preparation of, performance of, and reimbursement for all costs incurred by EPA in connection with a Remedial Investigation/Feasibility Study ["RI/FS"] for the Spectron, Inc. Site located in Elkton, MD ["Site"]. It is therefore ordered that:

A. This Consent Order is issued pursuant to the authority vested in the President of the United States by Sections 104 and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ["CERCLA"], 42 U.S.C. §§ 9604 and 9622, and delegated to the Administrator of the EPA on January 23, 1987, by Executive Order 12580, 52 Fed. Reg. 2923, and further delegated to the Regional Administrators of EPA by EPA Delegation No. 14-14-C.

B. The Respondents consent to and will not contest EPA jurisdiction regarding this Consent Order.

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II. STATEMENT OF PURPOSE

- A. In entering into this Consent Order, the mutual objective of EPA and the Respondents is to complete satisfactorily an RI/FS for the Site, as hereinafter described. The Remedial Investigation shall characterize the geology and hydrogeology of the Site, determine the nature and extent of the contamination at or from the Site, and characterize all ecological zones including terrestrial, riparian, wetlands, aquatic/marine, and transitional. Respondents shall prepare, for inclusion with the RI and FS Reports, a determination of the nature and extent of the threat to the public health or welfare or the environment caused by the release or threatened release of any hazardous substances, pollutants, or contaminants at or from the Site ["Risk Assessment"]. The Feasibility Study shall determine and evaluate (based on treatability testing, where appropriate) alternatives for remedial action to prevent, mitigate or otherwise respond to or remedy the release or threatened release of hazardous substances, pollutants, or contaminants at or from the Site consistent with the risk assessment (including any adverse impacts to human health or the environment that may result from the activities associated with remediation). The alternatives evaluated shall include, but shall not be limited to, the range of alternatives described in the National Oil and Hazardous Substances Pollution Contingency Plan ["NCP"], 40 C.F.R. Part 300, and shall include remedial actions that utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. In evaluating the alternatives, the Respondents shall address the factors required to be taken into account by Section 121 of CERCLA, 42 U.S.C. § 9621, and Section 300.430(e) of the NCP, 40 C.F.R. § 300.430(e).
- B. The activities conducted pursuant to this Consent Order are subject to approval by EPA and shall be consistent with the NCP, 40 C.F.R. Part 300, and shall be conducted in compliance with all applicable EPA guidances, policies, and procedures. Respondents shall be responsible for preparing a Risk Assessment, as permitted in EPA's September 1, 1993 Memorandum entitled "New Policy on Performance of Risk Assessments During RI/FS conducted by PRPs."
- C. The activities conducted under this Consent Order shall provide all necessary information for the RI/FS, the Risk Assessment, and for a record of decision ["ROD"] for selection of a remedial action that is consistent with CERCLA and the NCP.

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III. FINDINGS OF FACT

EPA has made the following Findings of Fact, which Respondents do not admit:

- A. The Respondents listed in Appendix A are corporations, individuals or political subdivisions.
- B. Each Respondent arranged for the disposal or treatment of or arranged with a transporter for disposal or treatment of hazardous substances at the Site and/or each Respondent accepted hazardous substances for transport to the Site, and selected the Site.
- C. The Site is located at 111 Providence Road, Elkton, Maryland, and includes all areas in which hazardous substances have come to be located. The Site is located in a semi-rural residential area; to the north and west of the Site are a wooded area and residential homes. Nineteen residences are located within one quarter mile of the Site, some of which are no more than fifty feet from the Site. A stream, Little Elk Creek, bisects the Site from northwest to southeast. This stream is used by local residents for fishing. Chemical handling, processing and storage facilities are located on the southwest portion of the Site. The Site office and parking area are located to the northeast.
- D. Paul J. Mraz Sr. and the Estate of Sally K. Mraz are the owners of the property at 111 Providence Road, Elkton, Maryland.
- E. From 1961 to approximately August 1988, three companies operated, seriatim, at the property located at 111 Providence Road, Elkton, Maryland. These companies were all principally owned and operated by the Mraz family. From 1961 to approximately 1975, the Site was the location of Galaxy Chemicals, Inc. ["Galaxy"], which went bankrupt in 1975. Galaxy reclaimed, treated, reprocessed, and recycled industrial wastes, primarily waste solvents. Operations at the Site started again as early as 1976 under the name of Solvent Distillers, Inc. In February 1978, Solvent Distillers changed its name to Spectron, Inc. ["Spectron"]. Spectron operated a waste recycling and reclamation facility at the Site from 1978 to 1988.
- F. Galaxy and Spectron were involved in the reclamation of a wide range of industrial solvents and flammable waste streams generated by a wide spectrum of sources, including industrial

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and commercial sources; this reclamation process did not completely eliminate the waste by-products. Spectron received wastes at the Site from sources throughout the eastern United States, primarily located along the Atlantic seaboard.

- G. When Spectron ceased operating in August of 1988, many substances received, processed, generated and used in its operations were left onsite.
- H. On April 12, 1989, EPA, at the request of the Maryland Department of the Environment ["MDE"], conducted an emergency assessment of the conditions at the Site. EPA found approximately 1300 drums and 62 tanks containing substances onsite. Many of these substances were identified by drum markings, hazardous waste labels, placards, hazardous waste manifests and Spectron records as flammable liquids and flammable solids and as hazardous wastes. Some of the drums and tanks were leaking, rusted and/or dented or were otherwise unsuitable for storage or transport of hazardous wastes.
- I. Field testing and laboratory analyses by EPA showed that liquids in approximately one half of the liquid-containing drums at the Site had flash points of less than 73 degrees Fahrenheit. These substances are designated Class I material (most flammable) by the National Fire Prevention Association.
- J. On May 24, 1989, an EPA On-Scene Coordinator ["OSC"] began a removal action at the Site, using authority delegated to him pursuant to CERCLA. The actions taken included commencement of 24-hour Site security and fire watch and containment of leaks in drums and tanks onsite. On June 1, 1989, the EPA Region III Regional Administrator approved the expenditure of funds, pursuant to Section 104 of CERCLA, to address the releases and threat of releases of hazardous substances at the Site. EPA's actions at the Site from June 1 until the end of August 1989 included the overpacking of leaking drums, containing and decanting leaking tanks, sampling and analysis of substances onsite, identification and segregation of those substances, treatment and disposal of contaminated water in the containment dikes and continued 24-hour Site security and fire watch.
- K. On August 21, 1989, EPA entered into Administrative Order by Consent (the "August 1989 Order") Docket No. III-89-23-DC, with certain parties referred to collectively in the August 1989 Order as the Spectron Site Waste Generator and Transporter Group. The August 1989 Order required the conduct of emergency response actions at the Site. These actions were undertaken pursuant to CERCLA Section 106.

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- L. Actions required pursuant to the August 1989 Order have been completed. All bulk wastes in tanks and drums and containerized chemicals have been removed and disposed of. The immediate threat of fire and explosion at the Site has been mitigated. Tanks remaining onsite have been rinsed.
- M. EPA sample analyses and analyses performed pursuant to the August 1989 Order showed that the drums and tanks onsite contained a large volume of numerous hazardous substances, as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), including, but not limited to: methylene chloride, trichloroethylene, 1,1,1-trichloroethane, toluene, methyl ethyl ketone, acetone and polychlorinated biphenyls ["PCBs"]. These and other hazardous substances have been released into the environment. Levels of these hazardous substances and some of the locations where they have been released, both on and off the Site, are shown in Table A, which is attached hereto and incorporated into this Order by reference. Examples of these releases are as follows:
1. The drum storage areas and tanks had containment dikes around them to protect against spills and leaks from those containers. EPA observed that hazardous substances appear to have spilled both inside and outside the containment dikes. Analyses of samples taken from some of these containment areas by MDE in 1985 and 1987 showed hazardous substances (see Table A). Contaminated water may have overflowed from these areas and discharged into Little Elk Creek. In 1989-1990, the interiors of the containment dikes were pressure washed to remove sources of contamination.
 2. Uncontrolled, discolored liquid seeps discharge from the area of the Site where the hazardous substances were stored, including several seeps emanating from the stream bank, flowing directly into Little Elk Creek. These seeps contain high concentrations of hazardous substances and are a significant source of contamination in Little Elk Creek. Levels of hazardous substances in these seeps are shown in Table A.
 3. Uncontrolled stormwater runoff from the Site, which can carry spilled or leaked hazardous substances, flows directly into the Little Elk Creek. Results of analysis of samples taken from Little Elk Creek at and below the Site are shown in Table A.
 4. A large oily sheen was observed on Little Elk Creek on October 17, 1989. This was caused by one of the seeps on the stream bank. This oily sheen covered at least 100

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feet of the creek.

5. Air monitoring at the Site and at private residences near the Site has detected the recurring presence of vapors containing volatile organic chemicals both on and adjacent to the Site and in private residential properties near the Site. Vapor levels as high as 150 ppm have been detected at one or more of the seeps emanating from the Site. In August 1995, the EPA Environmental Response Team (ERT), through a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR), collected air samples for volatile organic compounds at locations near the Site accessible to the general public. Analytical results indicated that the air near the Site does not contain hazardous substances at levels of public health concern.
- N. The hazardous substances present onsite and released into the environment include human and environmental toxins, as well as known or suspected human carcinogens. These substances can have numerous other adverse health effects, including the following. Exposure to acetone can result in irritation to mucous membranes, including conjunctivitis, pharyngitis, inflammatory bronchitis and gastroduodenitis. Methylene chloride is considered a probable human carcinogen and can cause decreased visual and auditory skills and impair psychomotor skills. Methyl ethyl ketone can affect the human nervous system and cause irritation of the eyes, mucous membranes and skin. PCBs can cause chloracne, impairment of liver function, birth abnormalities and are considered a probable human carcinogen. 1,1,1 trichloroethane can depress the central nervous system, alter cardiovascular function and damage the lungs, liver and kidneys. Trichloroethylene is a probable human carcinogen and can affect the bone marrow, central nervous system, liver and kidneys. Toluene exposure can depress the central nervous system and can cause narcosis.
- O. During the course of cleanup activities under the August 1989 Order, seeps of hazardous substances into Little Elk Creek were observed. The source of these seeps may be from surface contamination above and/or from subsurface sources. Hazardous substances found in seep and creek samples include methylene chloride, trichloroethane and dichloroethane.
- P. On January 16, 1990, the Regional Administrator of EPA Region III determined that the continued release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or to the environment.

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- Q. In February 1990, EPA initiated a response action to post warning signs on Little Elk Creek both at and below the Site. This was done to warn the public about stream contamination and against fishing in Little Elk Creek.
- R. On October 1, 1991, EPA entered into an Administrative Order by Consent (the "October 1991 Order") Docket No. III-90-40-DC, with certain parties referred to collectively in the October 1991 Order as the Spectron Site Waste Generator and Transporter Group II. The primary objective of the October 1991 Order is to control releases from seeps and/or groundwater at the Site which are entering Little Elk Creek. To date, the Spectron Site Waste Generator and Transporter Group II have demonstrated that dense non-aqueous phase liquids (DNAPLs) are present at the Site and have agreed to implement a plan which is designed to control releases to the stream. Much of the data generated pursuant to the October 1991 Order may also be relied upon in conducting the RI required by this Order. It is the mutual intent of EPA and Respondents to utilize that data to the extent practicable in meeting the data requirements of the RI. It is also the mutual intent of EPA and Respondents to consider the presence of DNAPL in evaluating the technical practicability of Site remedial options.
- S. The Site was proposed for inclusion on the National Priorities List ["NPL"] in October 1992; the Site's listing on the NPL became final in May 1994.
- T. Communication with both the public and the numerous potentially responsible parties during response actions to address the release or threat of release of hazardous substances at or from the Site is necessary.

IV. EPA's CONCLUSIONS OF LAW

EPA has made the following Conclusions of Law which Respondents do not admit:

- A. The Spectron, Inc. Site is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
- B. Each Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
- C. "Hazardous substances," as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), have been disposed of at the Spectron, Inc. Site and are currently present there.

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- D. The presence of hazardous substances at the Site and the past, present, and/or potential migration of hazardous substances at or from the Site constitutes an actual and/or threatened "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- E. The Respondents are liable under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
- F. In order to be allowed to conduct the RI/FS, the Respondents are required by Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1), to reimburse the Superfund for any cost incurred by the United States under or in connection with the contract or arrangement of a qualified person to assist in overseeing and reviewing the conduct of the RI/FS.

V. DETERMINATIONS

Based on the Findings of Fact and Conclusions of Law set forth above, EPA has determined that:

- A. The actions required by this Consent Order are necessary to protect the public health and welfare and the environment.
- B. EPA has determined that the Respondents are qualified to conduct the RI/FS, including the Risk Assessment, within the meaning of Section 104(a) of CERCLA, 42 U.S.C. § 9604(a), and will carry out the work properly and promptly if the Respondents comply with Section VIII of this Consent Order.

VI. PARTIES BOUND

- A. This Consent Order shall apply to and be binding upon EPA, upon Respondents and their successors and assigns, and upon all persons, contractors and consultants acting under or for the Respondents. No change in ownership or corporate or partnership status of the Respondents, nor ownership of the Site, will in any way alter the Respondents' obligations under this Consent Order.
- B. In the event of any change in ownership or control of a Respondent, such Respondent shall notify EPA in writing, no later than five (5) business days prior to the change, of the nature of the change and the anticipated date of the change. Respondent shall provide a copy of this Consent Order to its successors before the proposed change becomes irrevocable.
- C. The Respondents shall provide a copy of this Consent Order to

all contractors, subcontractors, laboratories, consultants, and supervisory personnel retained to conduct or monitor any portion of the work required by this Consent Order within seven (7) calendar days of the effective date of this Consent Order or on their date of retention, whichever is later, and shall condition all such contracts on compliance with the terms of this Consent Order. Notwithstanding the terms of any contract, Respondents are responsible for complying with this Consent Order and for ensuring that their contractors, subcontractors, laboratories, consultants, supervisory personnel, and agents comply with this Consent Order.

VII. NOTICE TO THE STATE

EPA is notifying the State of Maryland ["State"] that this Consent Order is being issued by providing a copy to the State.

VIII. WORK TO BE PERFORMED

- A. Respondents shall perform an RI/FS for the Site in accordance with the requirements of CERCLA, the NCP, this Consent Order (including any documents approved by EPA pursuant to this Consent Order), and relevant guidance documents. To the extent that EPA determines it is practicable, the RI/FS shall take into account the effects of the removal action being implemented under the October, 1991 Order.
- B. All response work performed pursuant to this Consent Order shall be under the direct supervision of qualified personnel.
 1. Within 30 calendar days after the effective date of this Consent Order, Respondents shall notify EPA in writing of the identity and qualifications of the primary contractor(s) and/or supervisory personnel to be used in carrying out the work to be performed pursuant to this Consent Order. Respondents have a continuing obligation to notify EPA of the identity and qualifications of any contractors, subcontractors, and supervisory personnel who will perform or oversee work required by this Consent Order within ten (10) calendar days after their retention.
 2. EPA may, in its discretion, disapprove the selection of any contractor, subcontractor, or supervisory personnel EPA considers to be unqualified or otherwise unable to perform the work and any contractor, subcontractor, or supervisory personnel EPA considers to be unqualified or otherwise unable to continue to perform any part of the

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work required by this Consent Order. In the event EPA disapproves of any such selection, Respondents shall notify EPA within ten (10) calendar days of receipt of notice of such disapproval of the identity and qualifications of the person, contractor, subcontractor, or supervisory personnel that will replace the one whose selection or use was disapproved.

3. In the event EPA subsequently disapproves the selection of any replacement contractor, subcontractor, or supervisory personnel, EPA reserves the right to conduct a complete RI/FS (including a Risk Assessment), or any portion thereof, in accordance with the requirements of CERCLA and the NCP, and to seek reimbursement of its costs and/or to seek any other appropriate relief.
 4. EPA will provide a notice of acceptance of selection of the prime contractor to the Respondents. Nothing herein shall limit EPA's right to subsequently disapprove of the selection of such contractor.
- C. Work shall be performed in accordance with the terms, conditions, and schedule of an RI/FS work plan ["Work Plan"] to be submitted by Respondents for approval pursuant to Section IX of this Consent Order within sixty (60) calendar days after Respondents receive a notice of contractor acceptance from EPA. Upon approval of EPA, RI/FS activities may be phased to allow due consideration of the effects of removal actions being implemented under the October, 1991 Order. The work and Work Plan shall be consistent with CERCLA, the NCP, this Consent Order, and with all relevant EPA guidance and regulations. The Work Plan shall include, but not be limited to:
1. a comprehensive summary of known Site conditions which may incorporate by reference previous reports on such matters;
 2. a discussion of data gaps;
 3. methodology and logistics for obtaining information in order to meet the objectives of the RI/FS;
 4. data quality objectives;
 5. format (i.e., computer disc or equivalent) for presentation and transmittal of RI data to EPA;
 6. a sampling and analysis plan (including a Field Sampling Plan and a Quality Assurance Project Plan);

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7. a health and safety plan to protect the health and safety of workers, other personnel, and the public from the hazardous substances and work-related health and safety hazards during performance of the work required by this Consent Order and which provides for proper decontamination of personnel and equipment, monitoring and control of off-site migration of hazardous substances from the Site, and protection of public health from overexposure to hazardous substances during the performance of activities at the Site pursuant to this Consent Order. Applicable sections of the plan shall be at least as stringent as the Occupational Safety and Health Administration and EPA requirements including, but not limited to, those requirements found at 29 C.F.R. § 1910.120;
8. a plan for identifying and characterizing all relevant ecological zones and potential receptors, and the laboratory testing methods (e.g., bioassays) to be used to evaluate impacts to biological systems;
9. a strategy for identifying the need for and carrying out treatability studies, the elements of which are described in Paragraph D.3 of this Section;
10. a preliminary listing and discussion of applicable and relevant and appropriate requirements ["ARARs"]; other advisories, criteria, and guidance to be considered pursuant to Section 300.400(g)(3) of the NCP, 40 C.F.R. § 300.400(g)(3) ["TBCs"]; and a plan for refinement of ARARs and TBCs throughout the RI/FS process, including development of proposed cleanup levels; and
11. a schedule for expeditious completion of the RI and FS Reports, including projected start-up and delivery dates for milestone field work, treatability studies (as needed), written reports (including draft and final RI and FS Reports), and for meetings with EPA to present progress information about the Site. EPA acknowledges that on-going removal activities may affect the RI/FS schedule, especially RI/FS work related to Little Elk Creek downstream of the Site.

Upon request of Respondents, EPA will confer with the Respondents for the purpose of "pre-scoping" the Work Plan and for the discussion of or distribution of relevant EPA guidance documents and policies regarding the performance of an RI/FS. Any delays in the holding of such a meeting shall not excuse any delay in Respondents' obligation to comply with the project schedule.

D. Respondents shall implement the Work Plan according to its approved terms, conditions, and schedules, and shall prepare and submit the RI and FS Reports and the Risk Assessment for EPA's review as specified in the Work Plan and its accompanying schedule. Respondents shall prepare and submit the following for approval pursuant to Section IX of this Consent Order:

1. An RI Report which includes, but is not necessarily limited to, (a) a Site history (including past operations and releases), (b) a summary of previous investigations, reports and cleanup actions, (c) a Site description (including physical setting, climate, surface water hydrology and quality, geology, soils, hydrogeology and groundwater quality, fractures and groundwater movement, and ecology), (d) all chemical concentration data collected during the RI or during prior investigations (including data collection methods, maps of sample locations, summary data tables, and a copy of chemical data in a computer-readable format), and (e) a summary of potentially exposed populations (including locations, current land uses, alternative future land uses, activity patterns, and subpopulations of potential concern). Respondents shall provide seven (7) copies of the RI Report to EPA. Within ten (10) days of a request by EPA, Respondents shall provide a copy of all or any portions of the report in computer disk format approved by EPA.
2. An FS Report which develops proposed cleanup approaches, including proposed cleanup levels, as appropriate, and an appropriate range of waste management options that are protective of human health and the environment and that are evaluated through the development and screening of alternatives. The report shall contain a comparative analysis of the remedial alternatives against the nine evaluation criteria as described in the NCP and EPA's RI/FS guidance. Respondents shall provide seven (7) copies of the FS Report to EPA. Within ten (10) days of a request by EPA, Respondents shall provide a copy of all or any portions of the report in computer disk format approved by EPA.
3. Treatability Studies: Respondents shall conduct treatability studies, except where Respondents can demonstrate to EPA's satisfaction that they are not needed. Major components of the treatability studies include determination of the need for and scope of studies, the design of the studies, and the completion of the studies. Respondents shall provide EPA with the following deliverables:

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- a. Identification of Candidate Technologies Memorandum. Respondents shall identify candidate remedial technologies.
 - b. Treatability Testing Statement of Work. If EPA determines that treatability testing is required, Respondents shall submit a treatability testing statement of work.
 - c. Treatability Testing Work Plan. If EPA determines that treatability testing is required, Respondents shall submit a treatability testing work plan, including an expeditious schedule, sampling and analysis plan, and a health and safety plan.
 - d. Treatability Study Evaluation Report. Respondents shall submit a treatability study evaluation report.
- E. Beginning thirty (30) calendar days subsequent to the date on which the Work Plan identified in Section VIII.C of this Consent Order is approved by EPA, the Respondents shall provide EPA with a progress report for each preceding calendar month. At a minimum, each progress report shall include:
1. a description of the actions that have been taken toward achieving compliance with this Consent Order and the tasks set forth in the approved Work Plan;
 2. a summary of all results of sampling, tests, analytical data (whether or not it has undergone Quality Assurance/Quality Control review and interpretations) and all other information received or developed by the Respondents relating to conditions at the Site;
 3. a description of all data anticipated and activities scheduled for the next thirty (30) calendar day period; and
 4. a description of any problems encountered, any actions taken or to be taken to remedy or mitigate such problems, and a schedule of when such actions will be taken.
- F. 1. The Respondents shall meet with EPA technical representatives within 30 days after receiving approval of the Work Plan to facilitate execution of the Work Plan. EPA may, in its discretion, waive the meeting if it determines that the technical issues were resolved during the pre-scoping or scoping meetings.

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2. Not less than thirty (30) calendar days prior to submittal of the draft RI Report to EPA, Respondents shall meet with EPA to discuss Respondents' data and findings. The Respondents shall, at such meeting, present to EPA (a) a summary of their data and findings and (b) documentation supporting such information. Subject to Section XIV.E of this Consent Order, Respondents shall supply additional documentation requested by EPA relative to the RI Report within ten (10) business days of any such request.
- G. 1. In accordance with the schedule in the approved Work Plan, Respondents shall prepare and submit to EPA for approval a Risk Assessment that includes contaminant identification, exposure assessment, toxicity assessment, and human health and ecological risk characterization. The Risk Assessment shall be consistent with CERCLA, the NCP, and this Consent Order (including any EPA-approved documents submitted as a requirement of this Consent Order). Respondents shall conduct the Risk Assessment in accordance with (a) U.S. EPA, "Ecological Assessment of Hazardous Waste Sites: A Field and Laboratory Reference," EPA Doc. No. EPA/600/3-89/013 (March 1989); (b) U.S. EPA, "Review of Ecological Risk Assessment Methods," EPA Doc. No. EPA/230-10-88-041 (1988); (c) U.S. EPA, "Superfund Exposure Assessment Manual," Office of Emergency and Remedial Response (1988); (d) U.S. EPA, "Risk Assessment Guidance for Superfund: Volumes I & II," EPA Doc. Nos. EPA/540/1-89-002 and EPA/540/1-89-001 (1989); (e) U.S. EPA, "Framework for Ecological Risk Assessment," EPA Doc. No. EPA/630/R-92/001 (1992); (f) U.S. EPA Region III, "Exposure Point Concentrations in Groundwater," EPA Doc. No. EPA/903/8-91/002 (1991); (g) U.S. EPA Region III, "Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening," EPA Doc. No. EPA/903/R-93-001; (h) U.S. EPA Region III, "Use of Monte Carlo Simulation in Risk Assessments," EPA Doc. No. EPA/903-F-94-001; (i) U.S. EPA Region III "Interim Ecological Risk Assessment Guidelines" (1994); and (j) other applicable and/or relevant EPA guidance documents.
- H. EPA and Respondents recognize that, while undertaking an RI/FS, certain information and/or knowledge about the Site or technology or investigative methods may arise from public meetings, data collection, and other sources that may require modification to the Work Plan or to the field work. Any such modifications shall be made in conformance with Section XXVI of this Consent Order.

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I. EPA reserves its right to disapprove of work performed by the Respondents and reserves its right to request that Respondents perform response actions in addition to those required by, or as modified in the approved Work Plan, if EPA determines that such actions are necessary for the RI/FS (including the Risk Assessment) and that Respondents are qualified and can carry out such actions properly and promptly. In the event that Respondents decline to perform such additional and/or modified actions, EPA reserves the right to undertake such action(s) and to seek reimbursement of its costs and/or to seek any other appropriate relief.

J. EPA reserves the right to undertake removal and/or remedial actions at any time that such actions are appropriate under CERCLA and the NCP, and to seek reimbursement for any costs incurred or seek any other appropriate relief.

K. 1. The Respondents' Project Coordinator or a Chairperson of the Galaxy/Spectron Group shall sign a certification to the final RI, Risk Assessment, and FS reports in accordance with the requirements of this provision.

2. The certification required by this subsection K shall be in the following form:

"Except as provided below, I certify that the information contained in or accompanying this [type of submission] is true, accurate and complete.

As to those portions of this [type of submission] for which I cannot personally verify their accuracy, I certify that this [type of submission] and all attachments were prepared at my direction and with my review, in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete to the best of my knowledge, information, and belief.

This certification shall not apply to information contained herein that was inserted into this [type of submission] by EPA, or was required by EPA to be inserted into this [type of submission], over my objection."

L. 1. In the event EPA elects to perform all or any portion of the work required by this Consent Order or to oversee

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performance of such work by a party other than Respondents, EPA shall so notify Respondents in writing. Such notification ["Takeover Notice"] shall identify the Work required by this Consent Order which Respondents shall not perform ["Takeover Work"]. Upon receipt of any such Takeover Notice from EPA, Respondents shall be released from any further obligation under this Consent Order to complete such Takeover Work. Respondents shall not be released, however, from any other obligations under this Consent Order and shall specifically remain liable for, among other things, :

- (a) stipulated penalties for violations of this Consent Order which occurred prior to Respondents' receipt of any such Takeover Notice; provided, however, that stipulated penalties for violations of this Consent Order relating to Takeover Work shall continue to accrue only until (1) EPA, or another party pursuant to an agreement with or order by EPA, commences performance of such Work, or (2) sixty (60) days from the date of Respondents' receipt of the Takeover Notice, whichever is earlier; and
 - (b) oversight costs incurred prior to Respondents' receipt of the Takeover Notice.
- (2) Unless otherwise provided in the Takeover Notice, Respondents shall not be released from their obligations under this Consent Order to perform any Work required by this Consent Order other than the Takeover Work and shall remain subject to stipulated penalties and responsible for reimbursement of oversight costs relating to all such work.

IX. SUBMISSIONS REQUIRING EPA APPROVAL

- A. After review of any plan, report, or other document submitted for EPA approval pursuant to this Consent Order ["Submission"], EPA may: (1) approve, in whole or in part, the Submission; (2) approve the Submission upon specified conditions; (3) modify and approve the Submission to cure the deficiencies; (4) direct Respondents to modify the Submission; (5) disapprove, in whole or in part, the Submission; (6) disapprove the Submission as substantially deficient; or (7) any combination of the above.
- B. In the event EPA approves the Submission in whole, Respondents shall take all actions required by the Submission. In all

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other cases, Respondents shall take all actions required by portions of the Submission which are approved by EPA.

- C. Except as otherwise provided in Paragraph D of this Section, Respondents shall, upon receipt of a notice of disapproval or notice requiring modification of the Submission, correct the deficiencies and resubmit the Submission for approval within fourteen (14) days of such receipt or such other time as may be specified by EPA in the notice.
- D. In the event that (1) any Submission is disapproved by EPA as substantially deficient, or (2) a resubmitted Submission, or portion thereof, is disapproved by EPA, Respondents shall be in violation of this Consent Order. EPA may, under such circumstances, conduct a complete RI/FS, including the Risk Assessment, or any portion thereof, and seek reimbursement of its costs; take any action described in Paragraph A of this Section; and/or seek any other appropriate relief.
- E. All Submissions, or portions thereof, shall, upon approval by EPA, be enforceable as requirements of this Consent Order.
- F. No failure by EPA to approve, disapprove, or otherwise respond to a Submission shall be construed as an approval of such Submission.
- G. Respondents shall provide one (1) copy of each draft of the following documents to the State at the same time each draft is provided to EPA:
 - 1. the Work Plan required by Section VIII.C of this Consent Order;
 - 2. the Remedial Investigation required by Section VIII.D of this Consent Order;
 - 3. the Risk Assessment required by Section VIII.G.1 of this Consent Order;
 - 4. the Feasibility Study required by Section VIII.D of this Consent Order; and
 - 5. each progress report required by Section VIII.E of this Consent Order.

Such documents shall be forwarded to the State at the following address:

Rick Grills
Maryland Department of the Environment

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Waste Management Administration
2500 Broening Highway
Baltimore, MD 21224

X. PUBLIC COMMENT

The administrative record file for the proposed remedial action, including the RI and FS Reports, the Risk Assessment, and documents considered or relied upon by EPA in developing the Proposed Plan, will be available for public review and comment pursuant to 40 C.F.R. § 300.430. Following the public review and comment period, EPA will notify the Respondents of the remedial action alternative(s) selected by EPA for implementation at the Site.

XI. DESIGNATED PROJECT MANAGERS

A. Respondents shall designate a Project Manager and shall notify EPA of its designated Project Manager no later than five (5) calendar days after the effective date of this Consent Order. Designation of a Project Manager shall not relieve Respondents of their obligations to comply with the requirements of the Order. The Respondents' Project Manager shall be a technical and/or managerial representative of the Respondents and may be a contractor and/or consultant; provided, however, the Respondents' Project Manager shall not be the legal representative of any Respondent in this matter. The Project Manager for EPA designated pursuant to this Section and the Project Manager for the Respondents shall be responsible for overseeing work required by this Consent Order. To the maximum extent possible, communications between the Respondents and EPA and all documents concerning the activities performed pursuant to the terms and conditions of this Consent Order, including plans, reports, approvals, and other correspondence, shall be directed to the Project Managers.

B. The Project Manager for EPA is:

Randy Sturgeon (3HW23)
Project Manager
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107
(215) 597-0978

C. EPA and the Respondents shall each have the right to change their respective Project Managers. Such change shall be

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accomplished by notifying the other party in writing at least five (5) days prior to the change.

- D. EPA's Project Manager shall have the authorities specified in 40 C.F.R. §§ 300.120 and 300.430 and shall have the authority to, inter alia, halt, modify, conduct, or direct any tasks required by this Consent Order and/or undertake any response actions or portions thereof when conditions present or may present a threat to public health or welfare or the environment as set forth in 40 C.F.R. § 300.415.
- E. The absence of the EPA Project Manager from the area under study pursuant to this Consent Order shall not be cause for the stoppage or delay of work.
- F. EPA will arrange for qualified persons to assist it in overseeing and reviewing the conduct of the RI/FS as required by Section 104(a) of CERCLA, 42 U.S.C. § 9604(a).

XII. SITE ACCESS

- A. To the extent that property included in the area under study pursuant to this Consent Order is presently owned or controlled by parties other than Respondents, the Respondents shall use best efforts to obtain Site access agreements from the present owners as soon as possible but no later than twenty (20) days after their receipt of approval of the Work Plan. Such agreements shall provide reasonable access, as detailed in Paragraph C of this Section, for performance of RI/FS activities for EPA, its authorized and designated representatives, representatives of the State and the Respondents and their authorized representatives. In the event that the property owner refuses to provide such access or access agreements are not obtained within the time designated above, whichever occurs sooner, the Respondents shall so notify EPA, in writing and within ten (10) calendar days, of all efforts undertaken to obtain access agreements as required by this Consent Order. EPA, solely in its discretion, may then take steps to obtain such access.
- B. Best efforts, as used in this Section, shall include, but shall not be limited to, a certified letter from Respondents to the present owners of such property requesting access agreements to permit Respondents and EPA and their authorized and designated representatives to access such property.
- C. EPA and the State and their authorized and designated representatives shall have the authority to enter and freely move about all property owned or controlled by Respondents

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subject to this Consent Order at all reasonable times for the purpose of, inter alia: inspecting records, operating logs, and contracts related to the Site; reviewing the progress of the Respondents in carrying out the terms of this Consent Order; conducting such tests as EPA deems necessary; using a camera, sound recording, or other documentary type equipment; and verifying the data submitted to EPA by the Respondents. In addition, EPA and/or its representatives shall have, for the purposes specified above, the authority to enter, at all reasonable times, all areas at which records related to the performance of the RI/FS are retained. The Respondents shall permit such persons to inspect and copy all records, files, photographs, documents, and other writings, including all sampling and monitoring data, in any way pertaining to work undertaken pursuant to this Consent Order. Confidentiality claims for any material so copied may be asserted in accordance with Section XIV of this Consent Order. Nothing herein shall be interpreted as limiting the inspection and information gathering authority of EPA under Federal law.

- D. In the event that EPA takes over the work pursuant to this Consent Order, Respondents shall provide, to EPA and its authorized and designated representatives, access to the Site and to any portions of the Site under their ownership or control for the purpose of conducting the RI/FS and performance of activities identified in Paragraph C of this Section.
- E. If any Respondent acquires title to or control over any portion of the Site to which such Respondent does not presently hold title or control, such Respondent shall allow EPA to have access to such property as specified in this Section.

XIII. QUALITY ASSURANCE

- A. While conducting sampling and analysis pursuant to this Consent Order, the Respondents shall implement quality assurance, quality control, and chain of custody procedures including, but not limited to, those described in:
 - 1. "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA" (OSWER Directive No. 9355.3-01 (1988));
 - 2. "EPA NEIC Policies and Procedures Manual" [No. EPA 330/978-001-R (revised May 1986)];

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3. "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plan" (No. QAMS-005/80 (December 1980));
 4. "A Compendium of Superfund Field Operations Methods" (OSWER Directive No. 9355-0-14 (December 1987));
 5. "Data Quality Objectives for Remedial Response Activities" (OSWER Directive No. 9355.0-7B (March 1987)); and
 6. Technical direction received from EPA at the meeting(s) described in Section VIII.F of this Consent Order.
- B. The Respondents shall consult with EPA in planning for, and prior to, all sampling and analysis required by the approved Work Plan. Further, as set forth in Section VIII of this Consent Order, Respondents shall not commence sampling until EPA approves of the Work Plan.
- C. In order to provide quality assurance and maintain quality control regarding all samples collected pursuant to this Consent Order, Respondents shall at a minimum:
1. Use a laboratory(s) which has a documented Quality Assurance Program that complies with EPA guidance document QAMS-005/80.
 2. Ensure that EPA personnel and EPA authorized and designated representatives are allowed access during normal business hours to the laboratory(s), records, and personnel utilized by the Respondents for analysis of samples collected pursuant to this Consent Order.
 3. Prepare a Quality Assurance Project Plan ["QAPjP"] for the sample collection and analysis to be conducted pursuant to this Consent Order. The QAPjP shall be submitted to the EPA Project Manager for review and approval prior to initiating any field investigations. The QAPjP and Field Sampling Plan ["FSP"] shall be submitted to EPA as part of the RI/FS Work Plan required in Section VIII.C.6 of this Consent Order. The purpose of the plan is to present, in detail, the data quality objectives, sample collection procedures, and data analysis processes and the procedures to ensure that the objectives are met. The guidances referenced in Paragraph A of this Section shall be used as guidance in the preparation of the QAPjP; additional guidance may be provided by EPA upon Respondents' request.

4. Ensure that the laboratory(s) analyzing samples required by this Consent Order use the methods and submit deliverables delineated in the current "Statement of Work" for the EPA Contract Lab Program ["CLP"] (current copies are available from the Environmental Services Division QA Section, Annapolis, Maryland [(410) 573-6837]). If any parameter to be analyzed for is not one of the parameters for which CLP methods are available, or with respect to non-CLP samples as provided in Paragraph C.9 of this Section, the laboratory(s) shall use methods which are EPA-approved (and which shall be described in the QAPjP).
5. Except with respect to non-CLP samples as provided in Paragraph C.9 of this Section, ensure that the laboratory(s) analyzing samples pursuant to this Consent Order agrees to demonstrate its capability to perform analysis in compliance with CLP requirements through the analysis of Performance Evaluation ["PE"] samples prior to conducting any analysis. EPA may waive analysis of PE samples if the laboratory has satisfactorily analyzed PE samples submitted by EPA or the appropriate state agency within the past six (6) months. Documentation of such PE sample analysis shall be submitted to the EPA Project Manager for verification.
6. At a time to be specified in the QAPjP, conduct an audit of each laboratory which will analyze samples from the Site while that laboratory(s) is conducting analyses. The audit shall verify analytical capability and be conducted according to procedures available from the ESD QA Section. Respondents shall submit an audit report to the EPA Project Manager within fifteen (15) calendar days of completion of the audit. The Respondents shall report serious deficiencies, including all those which adversely impact data quality, reliability or accuracy, and take corrective actions to correct such deficiencies within two (2) business days of the time the Respondents knew or should have known of the deficiency. Laboratories which are Superfund Contract Labs ["CLP Labs"] need not be audited.
7. Conduct at least one appropriate field audit (to be described in the QAPjP) during initial sampling activities to verify that field samplers are correctly following sampling procedures described in the quality assurance and/or sampling plans. A report of the field audit shall be sent to the EPA Project Manager within fifteen (15) days of completion of each audit. Respondents must report deficiencies and take corrective

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actions to correct such deficiencies within two (2) business days of the time the Respondents knew or should have known of the deficiency.

8. Provide data validation of analyses done by the laboratory(s) (to be described in the QAPjP). This data validation shall determine data usability and shall be performed in accordance with the Functional Guidelines for Data Review for data derived by CLP methods, or if another method is used, the data validation shall be performed in accordance with the QA/QC data validation criteria set forth in that method. For methods lacking QA/QC data validation protocols the Respondents shall establish validation criteria such as those in 40 C.F.R. Part 136, Appendix A. The appropriate quality assurance data validation summary reports shall be submitted along with sample data and summary sheets to the EPA Project Manager at the time sample results are provided to EPA.
9. Respondents shall be permitted to use non-CLP methods and procedures only as provided in "Data Quality Objectives for Remedial Response Activities" (OSWER Directive No. 9355.0-7B (March 1987)).
- D. In the event that the Respondents fail to use the QA/QC practices and procedures required herein, EPA reserves the right to conduct a complete RI/FS, including the Risk Assessment, or any portion thereof pursuant to its authority under CERCLA and the NCP and to seek reimbursement from the Respondents for the costs thereof and/or to seek any other appropriate relief.

XIV. SAMPLING AND DATA/DOCUMENT AVAILABILITY

- A. The Respondents shall make available to EPA the results of all sampling and/or tests or other data generated by the Respondents, or on the Respondents' behalf, with respect to the implementation of this Consent Order, and shall submit summaries of all such results no later than the date that the next monthly progress report is due.
- B. At the request of EPA, the Respondents shall allow split or duplicate samples to be taken by EPA and/or its authorized or designated representatives, of any samples collected by the Respondents pursuant to the approved Work Plan. The Respondents shall notify EPA not less than thirty (30) days in advance of any such sample collection activity.

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- C. EPA will determine the contents of the administrative record file for the selection of the remedial action. Respondents shall submit to EPA all documents developed during the course of the RI/FS, including the Risk Assessment, upon which selection of the response action may be based. Respondents shall, on or before the date of submission of the final FS Report, submit to EPA all documents and information which Respondents wish EPA to consider in the development of the Proposed Plan.
- D. At the request of EPA, Respondents shall provide copies of any of the raw data (whether or not it has undergone QA/QC review and interpretation) and/or field notes under its custody or control, or under the custody or control of its agent(s), relating to samples taken at the Site within fifteen (15) days of receipt of such request.
- E. All data, factual information, and documents submitted by the Respondents pursuant to this Consent Order shall be subject to public inspection unless at the time of submission Respondents assert a confidential business information or trade secret claim pursuant to applicable Federal law. Except as provided below, Respondents may assert such a claim covering information or documentation requested by or provided under this Consent Order in the manner described in 40 C.F.R. § 2.203(b). Such an assertion shall be adequately substantiated in accordance with 40 C.F.R. § 2.204(e)(4) at the time the assertion is made. Information subject to such a claim of confidentiality will be handled in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim of business confidentiality accompanies the information or documentation when it is submitted or made available to EPA, it may be made available to the public by EPA without further notice to the Respondents. Respondents shall not assert a claim of confidentiality with respect to physical, sampling, monitoring, or analytical data or the RI or FS Reports, or the Risk Assessment.
- F. Nothing in this Order shall limit EPA's information gathering authority under Federal law.

XV. RECORD PRESERVATION

- A. The Respondents shall preserve, during the pendency of this Consent Order and for a minimum of six (6) years after Respondents' receipt of the Notice of Completion issued pursuant to Section XXVIII.B of this Consent Order, all records and documents in their possession or in the possession of any of their divisions, officers, directors, employees,

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- agents, contractors, consultants, successors, and assigns that relate in any way to implementation of this Consent Order, or to hazardous substance management and/or disposal at the Site, including raw data, despite any document retention policy to the contrary. Each Respondent shall use its best efforts to obtain copies of all such documents in the possession of its employees, agents, accountants, contractors, or attorneys. After this six-year period, the Respondents shall notify EPA at least sixty (60) calendar days prior to the destruction of any such documents. EPA will then provide written notification to Respondents whether or not EPA wants to take possession of such documents. Upon request by EPA, the Respondents shall provide EPA with the opportunity to take possession of any such documents.
- B. Within sixty (60) days of the effective date of this Consent Order Respondents shall designate a custodian for all documents required to be preserved pursuant to Paragraph A of this Section ["Custodian"] and shall notify EPA of the identity of that Custodian. Respondents may change their Custodian upon written notification to EPA of such change. *
- C. Any agreement between Respondents and an agent, contractor, or consultant relating to performance of work under this Consent Order shall require in writing that said agent, contractor, or consultant maintain and preserve during the pendency of this Consent Order, and for a minimum of six (6) years after its termination, all data, records, and documents within its respective possession which relate in any way to implementation of this Consent Order or to hazardous substance management and/or disposal at the Site.
- D. Respondents shall not destroy any records relating to this Consent Order until notified by EPA, in accordance with this Section, that EPA has waived its right to obtain such records from Respondents.

XVI. DELAY IN PERFORMANCE AND STIPULATED PENALTIES

- A. For each day or any portion thereof that Respondents fail to submit a report or document or otherwise fail to comply with the requirements of this Consent Order at the time and in the manner set forth herein (including all documents submitted hereunder and approved by EPA), Respondents shall be liable for and Respondents shall pay, upon demand by EPA, the sums set forth below as stipulated penalties to EPA. Payment shall be due and owing within thirty (30) days from receipt of EPA's demand letter. Interest at the rate of the current annualized

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treasury bill rate shall begin to accrue on the unpaid balance at the end of the thirty-day period in conformance with 40 C.F.R. § 13.11(a).

- B. Checks in payment of stipulated penalties shall be made payable to the Hazardous Substance Superfund and shall be addressed to:

EPA Hazardous Substance Superfund
U.S. EPA, Region III
ATTENTION: Superfund Accounting
P.O. Box 360515
Pittsburgh, PA 15251-6515

All payments shall reference the name of the Site, the Respondents' name and address, and the EPA docket number of this Consent Order. Copies of the transmittal letter and check shall be sent simultaneously to the EPA Project Manager and to the:

Regional Docket Clerk (3RC00)
U. S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

- C. Stipulated penalties shall accrue in the amount of \$500 per day per violation for the first week, \$1,000 per calendar day per violation for each day thereafter for the following 21 days, and \$5000 per day per violation for each day thereafter.
- D. The stipulated penalties set forth in this Section do not preclude EPA from pursuing other penalties or sanctions available to EPA for Respondents' failure to comply with the requirements of this Consent Order.
- E. All penalties and interest shall begin to accrue on the date that performance is due or a violation occurs, and shall continue to accrue through the final day of correction of the noncompliance.
- F. Nothing herein shall prevent the simultaneous accrual of separate stipulated penalties for separate violations of this Consent Order.
- G. If the Respondents in good faith object to the imposition of stipulated penalties, they may invoke the dispute resolution

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procedures under Section XVIII of this Consent Order. Respondents shall not dispute stipulated penalty rates established in Paragraph C of this Section. To the extent Respondents do not prevail upon resolution of the dispute, Respondents shall pay the penalties owed within thirty (30) days of receipt of notice of the resolution of the dispute. These penalties shall include all penalties which accrued prior to and during the period of dispute.

- H. Neither the filing of a petition to resolve a dispute nor the payment of penalties shall alter in any way Respondents' obligation to comply with the requirements of this Consent Order.

XVII. FORCE MAJEURE AND NOTIFICATION OF DELAY

- A. 1. A failure by Respondents to comply with any requirement of this Consent Order in the manner or in the time required by this Consent Order ["Compliance Failure"] shall constitute a violation of this Consent Order unless such Compliance Failure has resulted from a Force Majeure Event within the meaning of Paragraph B of this Section. To the extent that a delay is caused by a Force Majeure Event, the schedule for performance of work affected by the delay will be extended by EPA for the time necessary to complete such work on an expedited basis, up to the period of the delay directly resulting from the Force Majeure Event. Except as may be specifically provided by EPA, no such schedule extension shall affect the schedule for completion of any other tasks required by this Consent Order.

2. A Force Majeure Event is any event which EPA agrees:

- (a) arises from causes not reasonably foreseeable and beyond the control of Respondents, and
- (b) results in delays or prevents performance by a date or in a manner required by this Consent Order,

provided that Respondents have used best efforts to perform as required by this Consent Order. "Best efforts" as used in this Paragraph shall include, but not be limited to, efforts to expedite the performance of activities in order to minimize delays to the extent practicable. Neither increased costs of performance;

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changed economic circumstances; difficulties caused by reasonably foreseeable weather conditions which could have been overcome by best efforts; nor failure to obtain Federal, State, or local permits shall be considered a Force Majeure Event.

3. Respondents shall have the burden of proving that a Force Majeure Event has occurred.
- B. The Respondents shall notify EPA of any delay or anticipated delay in achieving compliance with any requirement of this Consent Order. Such notification shall be made orally as soon as possible but no later than two (2) business days after Respondents or any of their agents or contractors becomes aware of such delay, or through the exercise of due diligence should have become aware of such delay, and in writing no later than seven (7) days after Respondents or any of their agents or contractors becomes aware, or through the exercise of due diligence should have become aware, of such a delay or anticipated delay. The written notification shall describe fully the nature of the delay; the reasons the delay is beyond the control of Respondents (if applicable); the actions that will be taken to mitigate, prevent, and/or minimize further delay; the anticipated length of the delay; and the timetable according to which the actions to mitigate, prevent, and/or minimize the delay will be taken. The Respondents shall adopt all reasonable measures to avoid and minimize any such delay. Failure of the Respondents to comply with the notice requirements of this Section shall constitute a waiver of the Respondents' right to invoke the benefits of Paragraph A of this Section with respect to that event.
- C. In the event that EPA and the Respondents cannot agree that a particular delay in achieving compliance with the requirements of this Consent Order has been or will be caused by a Force Majeure Event, the dispute shall be resolved in accordance with the provisions of Section XVIII of this Consent Order. The Respondents shall have the burden of proving that the delay was caused by a Force Majeure Event.
- D. Modifications to this Consent Order following a Force Majeure Event shall be made in accordance with Section XXVI of this Consent Order.

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XVIII. DISPUTE RESOLUTION

- A. The resolution of any dispute between EPA and Respondents concerning this Consent Order shall be conducted in accordance with this Section.
- B. 1. If the Respondents object to any EPA notification or action under this Consent Order, the Respondents shall notify EPA in writing of their objection(s) within fourteen (14) days of such action or receipt of such EPA notification.
2. The written notification of objections from Respondents, referred to in Paragraph B.1 of this Section ["Notice of Dispute"], shall identify the issue(s) in dispute, the position Respondents maintain should be adopted by EPA, the basis for Respondents' position, and any matters Respondents consider necessary for EPA's determination.
3. Except as provided herein, EPA and the Respondents shall have fourteen (14) days from EPA's receipt of the Notice of Dispute to resolve the dispute. As to any issue for which agreement is not reached during this period, EPA will provide a written statement of its decision to Respondents ["EPA Resolution Notice"]. The EPA Resolution Notice shall be signed by the Chief, Superfund Remedial Branch. EPA may extend the fourteen (14) day period up to an additional fourteen (14) days if EPA determines that more time is necessary for resolution. Respondents shall not invoke this Section to object to an EPA Resolution Notice.
4. Following resolution of the dispute by agreement (in the event the dispute has been resolved by agreement) or Respondents' receipt of the EPA Resolution Notice (in the event EPA and Respondents are unable to reach agreement), Respondents shall perform the work that was the subject of the dispute in accordance with the agreement (if applicable) or the EPA Resolution Notice.
- C. Notwithstanding any other provisions of this Consent Order, no action or decision by EPA pursuant to this Consent Order shall constitute final agency action giving rise to any right to judicial review prior to EPA's initiation of judicial action to compel compliance with this Consent Order.

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- D. Neither invocation of the procedures set forth in this Section, nor EPA's consideration of matters placed into dispute, shall excuse, toll or suspend any compliance obligation or deadline required pursuant to this Consent Order during the pendency of the dispute resolution process.
- E. The existence of a dispute under this Section shall not by itself expand the time frame for completing any work under this Consent Order. Thus, in the event the Respondents prevail in the dispute, Respondents shall complete the task in the remaining amount of time originally specified in the Consent Order unless the time frame is formally modified by EPA. Any such modifications to this Consent Order shall be made in accordance with Section XXVI of this Consent Order.
- F. The accrual of stipulated penalties shall continue notwithstanding the existence of a dispute or invocation of the procedures set forth in this Section.
- G. In order to prevail in any dispute concerning costs under Section XX of this Consent Order, Respondents shall have the burden of proving that such costs have been calculated incorrectly or have been incurred in a manner inconsistent with the NCP.

XIX. RESERVATION OF RIGHTS

- A. Except as expressly provided in this Consent Order, (1) each party reserves all rights and defenses it may have, and (2) nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Consent Order; to seek injunctive relief; to seek imposition of statutory penalties, fines, and/or punitive damages; or any other appropriate relief. Nothing in this Consent Order shall affect EPA's response authorities including, but not limited to, EPA's right to seek injunctive relief, stipulated penalties, statutory penalties, punitive damages, and/or reimbursement of response costs.
- B. Compliance by Respondents with the terms of this Consent Order shall not relieve Respondents of their obligation to comply with applicable local, State, or Federal laws and regulations.
- C. As provided by this Consent Order, EPA expressly reserves its right to disapprove of actions taken by the Respondents pursuant to this Consent Order and work performed by the

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Respondents, and reserves its right to request that the Respondents perform response actions in addition to those required by this Consent Order if it determines that such actions are necessary. In the event that Respondents choose to perform such additional tasks, the approved Work Plan shall be reviewed and revised accordingly and the schedule for completion of the work set forth in the Work Plan shall be extended to the extent necessary to accommodate the performance of additional tasks. In the event that the Respondents decline to perform such additional actions, EPA reserves the right to undertake such actions. In addition, EPA reserves the right to undertake removal and/or remedial actions at any time that such actions are appropriate under the NCP, to seek reimbursement for any costs incurred, and/or to seek any other appropriate relief, including requiring Respondents to perform such actions. Further, EPA reserves the right to bring an action against Respondents under Section 107 of CERCLA, 42 U.S.C. § 9607, for recovery of all response costs, including oversight costs, that are incurred by the United States at the Site and not reimbursed by the Respondents.

- D. If EPA requests, Respondents shall incorporate and integrate information supplied by EPA into the final RI, Risk Assessment, and FS reports.

XX. REIMBURSEMENT OF COSTS

- A. EPA will periodically submit to the Respondents a summary report of response costs, including oversight costs, paid by the U.S. in connection with this Consent Order. Oversight costs shall include administrative, enforcement, inspection, and investigative costs paid by EPA, its agents, or contractors in connection with EPA's oversight of the work performed by the Respondents under the terms of this Consent Order and shall include, but not be limited to, time and travel costs of EPA personnel and associated indirect costs, contractor costs, costs of compiling cost documentation, compliance monitoring, collection and analysis of split samples, inspection of RI/FS activities, Site visits, interpretation of Consent Order provisions, discussions regarding disputes that may arise as a result of this Consent Order, and review and approval or disapproval of reports. At the time that EPA submits its summary report, EPA agrees to make available copies of its non-confidential accounting

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records used by EPA to prepare its accounting, including MARS reports and non-confidential portions of contractor work orders, relating to oversight costs for which EPA seeks reimbursement and which are in EPA's custody.

B. Respondents reserve the right to contest oversight costs claimed by EPA as being calculated incorrectly and/or having been incurred in a manner inconsistent with the NCP. The Respondents shall, within thirty (30) calendar days of receipt of the above-referenced summary report, do one of the following:

1. Notify EPA in writing that Respondents are contesting some of the costs, state the reasons for contesting those costs and remit a check for the uncontested costs;

2. Notify EPA in writing that Respondents are contesting all of the costs and state the reasons for contesting those costs; or

3. Remit a check for all such costs.

In the event that Respondents contest some or all of the costs, EPA shall determine if those contested costs were calculated incorrectly and/or were incurred in a manner inconsistent with the NCP. EPA's determination shall be subject to the dispute resolution provisions of Section XVIII of this Consent Order. If EPA determines that some or all of the contested costs were calculated incorrectly or were incurred in a manner inconsistent with the NCP, then, to the extent appropriate, such costs shall not become payable under this Order. If EPA determines that some or all of the contested costs were calculated correctly and were incurred in a manner not inconsistent with the NCP, then such costs, including interest accrued, shall become payable under this Order within thirty (30) days of the notice to Respondents' Project Coordinator of EPA's determination.

C. Payments made under this Section shall be made payable to the Hazardous Substance Superfund. Interest shall begin to accrue on the unpaid balance thirty (30) days after receipt of the above-referenced summary report, even if there is a dispute or an objection to any portion of the costs. Checks should specifically identify the Site name and CERCLA Site/Spill Identifier Number (03-06) and be forwarded to:

EPA Hazardous Substance Superfund

AR300036

U.S. EPA, Region III
ATTENTION: Superfund Accounting
P.O. Box 360515
Pittsburgh, PA 15251-6515

Respondents shall send a copy of the transmittal letter and check to the EPA Project Manager and to the EPA Region III Regional Docket Clerk at the address specified in Section XVI.B of this Consent Order.

XXI. OTHER CLAIMS

- A. Nothing in this Consent Order shall constitute or be construed as a release from any claim, cause of action, or demand in law or equity against any person, firm, partnership, or corporation not bound by this Consent Order for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from the Site.
- B. This Consent Order does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. § 9611(a)(2).
- C. By consenting to the issuance of this Consent Order, the Respondents waive any claim to reimbursement they may have under Section 106(b) of CERCLA, 42 U.S.C. § 9606(b), for any and all work performed and expenses incurred under this Consent Order.

XXII. OTHER APPLICABLE LAWS

- A. All actions required to be taken pursuant to this Consent Order shall be undertaken in accordance with the requirements of all applicable local, State, and Federal laws and regulations.
- B. In addition to any other requirement of Federal, State, and local laws and regulations, and except as provided herein, Respondents shall, prior to any off-site shipment of hazardous substances from the Site to an out-of-state waste management facility, provide written notification to the appropriate state environmental official in the receiving state and to the EPA Project Manager of such shipment of hazardous substances.

AR300037

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(30)

The requirements of this Paragraph shall not apply to any such off-site shipments when the total volume of such shipments will not exceed ten (10) cubic yards. The previous sentence shall not relieve Respondents of any notice obligations imposed by State or local laws.

1. The notification shall be in writing, and shall include the following information, where available: (1) the name and location of the facility to which the hazardous substances are to be shipped; (2) the type and quantity of the hazardous substances to be shipped; (3) the expected schedule for the shipment of the hazardous substances; and (4) the method of transportation. Respondents shall notify the receiving state of major changes in the shipment plan, such as a decision to ship the hazardous substances to another facility within the same state, or to a facility in another state.
2. Respondents shall determine the identity of the receiving facility and state following the award of the contract for the RI/FS. Respondents shall provide all relevant information regarding the off-site shipments, including information under the categories noted in Paragraph B.1 of this Section, as soon as practical after the award of the contract and in any event at least 14 calendar days before the hazardous substances are actually shipped.

XXIII. INDEMNIFICATION OF THE UNITED STATES GOVERNMENT

Respondents agree to indemnify and save and hold harmless the United States Government, its agencies, departments, agents, and employees, from any and all claims or causes of action arising from or on account of acts or omissions of Respondents or their agents, independent contractors, receivers, trustees and assigns in carrying out activities required by this Consent Order. This indemnification shall not be construed in any way as affecting or limiting the rights or obligations of Respondents or the United States under their various contracts.

XXIV. LIABILITY OF THE UNITED STATES GOVERNMENT

Neither the United States Government nor any agency thereof shall be liable for any injuries or damages to persons or property resulting from acts or omissions of Respondents, or

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of their employees, agents, servants, receivers, successors, or assignees, or of any persons, including, but not limited to firms, corporations, subsidiaries, contractors, or consultants, in carrying out activities pursuant to this Consent Order, nor shall the United States Government or any agency thereof be held as a party to any contract entered into by Respondents in carrying out activities pursuant to this Order.

XXV. MISCELLANEOUS

- A. Except as otherwise provided in this Consent Order, the term "days" shall mean calendar days. If a due date for any task or deliverable falls on a federal holiday or weekend, the due date for that task or deliverable shall be the next working day. "Working Day" shall mean a day other than a Saturday, Sunday, or federal holiday.
- B. In the event of conditions posing an immediate threat to human health or welfare or the environment, Respondents shall notify EPA and the State immediately upon discovery or when through the exercise of due diligence the Respondents should have discovered the conditions. In the event of unanticipated or changed circumstances related to any environmental or public health concern at the Site, Respondents shall notify the EPA Project Manager by telephone within twenty-four (24) hours of discovery of the unanticipated or changed circumstances. In the event that EPA determines that the immediate threat or the unanticipated or changed circumstances warrant changes in the Work Plan, EPA shall modify or amend the Work Plan in writing accordingly. Respondents shall perform the work as described in the Work Plan as modified or amended.

XXVI. ADMISSIONS

- A. This Order shall not be admissible as evidence in any proceeding except to enforce the terms of this Order or to prove the existence thereof. Entry into this Order, including the Work Plan, shall not constitute an admission against interest by the Respondents as to their liability or as to the facts set forth herein, nor shall it constitute a waiver of defenses by the Respondents for any purpose, other than enforcement of this Order. The Respondents specifically do not admit any matter of fact or law set forth herein including

AR300039

that the conditions at the Site present an imminent and substantial endangerment to public health, welfare or the environment, or that such conditions constitute a release or threat of release of a hazardous substance. However, Respondents shall not challenge EPA's findings of fact, conclusions of law, or determinations set forth in this Order, or EPA's jurisdiction to issue this Order, in any action by EPA to enforce this Order.

- B. No fact or opinion developed by Respondents' contractor pursuant to this Order shall be deemed an admission by the Respondents, except as to Respondents' compliance or noncompliance with the requirements of this Order. Nothing in this section shall be deemed to preclude admission into evidence by EPA of any information, fact or opinion developed by the Respondents' contractor pursuant to this Order in any proceeding, or to use such information, facts or opinion for any purpose.

XXVII. SUBSEQUENT MODIFICATION

- A. This Consent Order may be amended by mutual agreement of EPA and the Respondents. Such amendment shall be in writing and shall have as its effective date, the date on which such amendment is signed by EPA. The Parties agree that additional Respondent(s) may be added by an amendment to this Consent Order in the future. The addition of Respondent(s) shall be requested by a Chairperson of the Galaxy/Spectron Group, who is hereby authorized to sign any such amendment on behalf of the existing Respondents.
- B. 1. Minor modifications to the requirements of the Work Plan, specifically those which do not materially or significantly affect the nature, scope, or timing of the work to be performed, may be made by mutual agreement of the Project Managers. Any such modifications must be in writing and signed by both Project Managers. The effective date of the modification shall be the date on which the letter from EPA's Project Manager is signed.
2. Modifications to the requirements of the Work Plan that are not minor modifications as described in Paragraph B.1 of this Section may be made by mutual agreement of EPA and the Respondents. Any such modifications must be in writing and signed by Respondents' Project Manager and the Chief of the Superfund Delaware/Maryland Section.

AR300040

The effective date of the modification shall be the date on which the modification is signed by EPA.

- C. Respondents agree that any request for modification of this Consent Order shall be accompanied by a statement of how such modification shall affect the Work Plan schedule.
- D. Following EPA approval of a modification to a schedule, Respondents shall, within fourteen (14) days of receipt of the modification, supply to EPA a revised Work Plan schedule and accompanying charts which shall reflect the approved modifications to such schedule.
- E. Any reports, plans, specifications, schedules, or other submissions required by this Consent Order and any modifications thereto are, upon approval by EPA, enforceable as requirements of this Consent Order. Any non-compliance with such EPA-approved or modified reports, plans, specifications, schedules, or other submissions shall be considered non-compliance with the requirements of this Consent Order and shall subject the Respondents to, among other things, the requirements of Section XVI of this Consent Order.
- F. No informal advice, guidance, suggestions, or comments by EPA, other than a formal approval as specified in Section XXVI.A or B of this Consent Order, regarding reports, plans, specifications, schedules, and any other item submitted by the Respondents or regarding any other requirement of this Consent Order shall be construed as relieving the Respondents of their obligation to obtain formal approval when required by this Consent Order, and to comply with requirements of this Consent Order, unless formally modified.

XXVIII. EFFECTIVE DATE

The effective date of this Consent Order shall be three (3) working days following the date on which EPA forwards a fully executed true and correct copy to Respondents' representatives.

XXIX. NOTICE OF COMPLETION

- A. When Respondents believe that (1) the RI and FS, including the Risk Assessment, have been fully performed in accordance with

AR300041

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(Red)

the requirements of this Consent Order, (2) all costs reimbursable under Section XX of this Consent Order have been paid to EPA, and (3) all penalties assessed by EPA pursuant to this Consent Order have been paid to EPA, Respondents shall so notify EPA in writing ["Completion Petition"].

- B. If, following receipt of a Completion Petition, EPA determines that (1) the RI and FS, including the Risk Assessment, have been fully performed in accordance with the requirements of this Consent Order, (2) all costs reimbursable under Section XX of this Consent Order have been paid to EPA, and (3) all penalties assessed by EPA pursuant to this Consent Order have been paid to EPA, EPA shall so notify Respondents in writing ["Notice of Completion"]. EPA issuance of a Notice of Completion shall not alter or affect any provision of this Consent Order including, without limitation, Sections XV (Record Preservation), XIX (Reservation of Rights), XXI (Other Claims), XXIII (Indemnification of the United States Government), and XXIV (Liability of the United States Government).
- C. If EPA does not agree that (1) the RI and FS, including the Risk Assessment, have been fully performed in accordance with the requirements of this Consent Order, (2) all costs reimbursable under Section XX of this Consent Order have been paid to EPA, or (3) all penalties assessed by EPA pursuant to this Consent Order have been paid to EPA, EPA shall notify Respondents in writing of the activities that must be undertaken to complete such work. If applicable, EPA will set forth a schedule for performance of such activities consistent with this Consent Order or may require Respondents to submit a schedule for EPA approval. Respondents shall perform all activities described in EPA's notice in accordance with the specifications and schedules established pursuant to this Paragraph, subject to Respondents' right to invoke dispute resolution under Section XVIII of this Consent Order, and shall submit a Completion Petition to EPA in accordance with Paragraph A of this Section.

XXX. CONTRIBUTION PROTECTION

Pursuant to Section 113(f)(2) of CERCLA, 42 U.S.C. § 9613(f)(2), the Parties intend that Respondents are persons who have resolved their liability to the United States in this Consent Order for the work set forth in this Consent Order. Any Respondent who fails to comply fully with the terms of

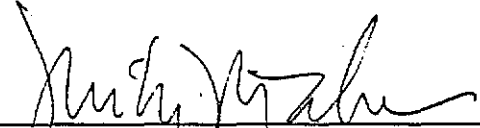
AR300042

ORIGINAL
(Red)

this Consent Order shall lose the benefit of this Section. Each of the Respondents agrees that if a suit or a claim for contribution is brought against it for matters covered by this Consent Order, it will timely notify the United States of the institution of such suit or claim. The United States reserves its full enforcement discretion whether to assist the Respondents in any way in defending against such suits for contribution.

IT IS SO AGREED AND ORDERED:

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY:



W. Michael McCabe
Regional Administrator
EPA Region III

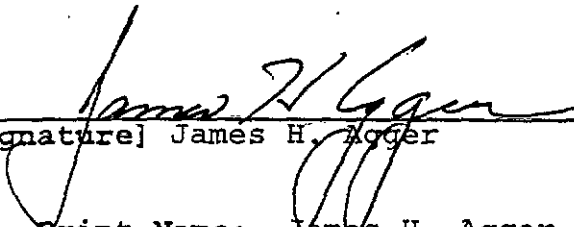
5/20/96

Date

AR300043

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature] James H. Agger

4/16/96
Date

Print Name: James H. Agger

Title: General Counsel, Vice President and Secretary

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Douglas W. Butler
[Signature]

18 April 1996
Date

Print Name: DOUGLAS W. BUTLER

Title: SENIOR ENVIRONMENTAL AFFAIRS MGR.

for AKZO NOBEL CEATINGSS INC
4730 CRITTENDEN DR.
LOUISVILLE, KY 40209

AR300045

FOR THE RESPONDENTS: Alcolac, Inc.

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Anthony Saviano
[Signature]

4/16/96
Date

Print Name: Anthony Saviano

Title: Assistant Secretary

AR300046

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

William F. Black
[Signature]

4/15/96
Date

Print Name: W. Ham F. Black
Title: Vice Site Remediation

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Harvey Goulet 4/15/96
[Signature] Date

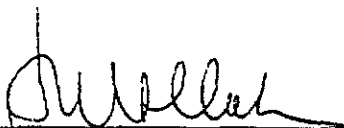
Print Name: Harvey Goulet

Title: V.P. Administration

AR300048

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:



[Signature]

April 10, 1996

Date

Print Name: Henry Pollak

Title: President

AR300049

netek, Inc

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

ARATANK INC.

Neal R. Stark
[Signature]

4/10/96
Date

Print Name: Neal R. STARK

Title: Vice President

AR300050

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:



[Signature]4-11-96
DatePrint Name: Ralph D'AngolaTitle: Vice President

AR300051

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Armstrong World Industries, Inc.


[Signature]

4/12/96
Date

Print Name: James E. Humphrey

Title: President, Floor Products - Americas

AR300052

ORIGINAL
(Red)

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Atlantic Aviation Corporation

F. S. Eyster

[Signature]

4/16/96
Date

Print Name: Franklin S. Eyster, II

Title: Senior Vice President & General Counsel

AR300053

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Philippa M. Guthrie
[Signature]

April 9, 1996
Date

Print Name: Philippa M. Guthrie

Title: Attorney for AVM/Maremont

AR300054

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Kent Bickell
[Signature]

April 16, 1996
Date

Print Name: Kent Bickell

Title: Manager, Environmental Practice
Ball Corporation

AR300055

Beazer East, Inc.

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Mary D. Wright 4/12/96
[Signature] Date

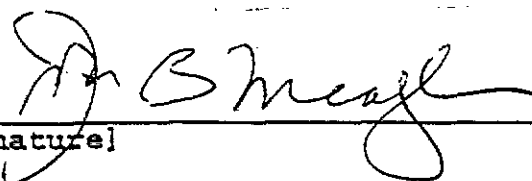
Print Name: MARY D. WRIGHT
Title: Assistant Secretary

AR300056

ORIGINAL
1996

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/9/96
Date

Print Name: John B. Meagher

Title: CORPORATE SECRETARY
BEST FOODS, a division of CPC INTERNATIONAL INC.

AR300057

ORIGINAL
(Red)

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Beryl L. Snyder
[Signature]

4/12/96
Date

Print Name: Beryl L. Snyder

Title: Vice President & General Counsel (Biocraft Laboratories, Inc.)

AR300058

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Bowhake, Inc.

3.4 Leif E. Olsen
[Signature]

15 April 1996
Date

Print Name: LEIF E. OLSEN

Title: V.P. Regulatory Affairs

AR300059

Borden, Inc.
ORIGINAL
(Borden)

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Sharon L Post
[Signature]

4/15/96
Date

Print Name: Sharon L. Post

Title: ENVIRONMENTAL Counsel

AR300060

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Richard M. Frankoski April 16, 1996
[Signature] Date

Print Name: Richard M. Frankoski

Title: Manager, Environmental Properties, HSE

AR300061

ORIGINAL
(90)

FOR THE RESPONDENTS:

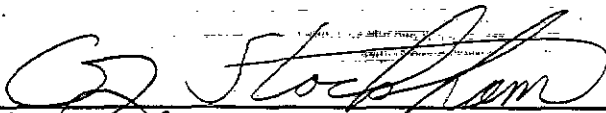
The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Robert M. Endries 4/17/96
[Signature] Date
The Rust L. Myers Squibb Family of Companies
Print Name: Robert M. Endries
Title: Assistant Secretary Rust L. Myers Squibb Company
Vice President E. R. Squibb & Sons Inc.

AR300062

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

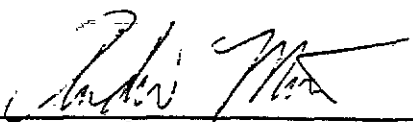

[Signature]

4-11-96
Date

Print Name: George J. Stockham
Title: Vice President - Operations

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/29/96
Date

Print Name: Andrew Morris

Title: V. P. - Finance

Cambridge, Inc.
(Formerly Cambridge Wire Cloth Company)
P.O. Box 399
Cambridge, MD 21613

AR300064

Carpenter Co.

ORIGINAL

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Joe W. Schmoeller
[Signature]

4/16/96
Date

Print Name: JOE W. SCHMOELLER

Title: SENIOR VICE PRESIDENT

AR300065

5-08-1996 9:28AM

FROM KKN*H 2013359577

CDI Dispersions

2a.
P.2

SPECTRON, INC. SITE
EPA Docket No. 111-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

David E. Schmedes
[Signature]

4.15.96
Date

Print Name: DAVID E. SCHMEDES
Title: PRESIDENT

AR300066

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Mary P. McConnell
[Signature] _____ Date _____

Print Name: Mary P. McConnell

Title: Vice President

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

THE GOODYEAR TIRE & RUBBER COMPANY

By: 
[Signature]

4-15-96
Date

Print Name: James C. Whiteley

Title: Vice President

Attest:


Assistant Secretary, P. A. Kempf

AR300068

Original
(1 of 2)

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/12/96
Date

Print Name: Alvin E. Ludwig

Title: VP-Controller
GTE Operations Support Incorporated*
One Stamford Forum
Stamford, CT 06904

*Successor in interest in this matter to:
GTE Products Corporation
GTE Sylvania Incorporated
Sylvania Electric Products Incorporated

AR300069

Holstead Industries, Inc.

SPECTRON, INC. SITE
EPA Docket No. 111-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Joseph J. Buczowski
[Signature]

4/30/96
Date

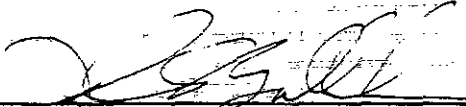
Print Name: JOSEPH J. Buczowski
Title: VP Administration

AR300070

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

For: Handy & Harman


[Signature] John C. Bullock 15 April 1996
Date

Print Name: John C. Bullock

Title: Environmental Counsel

Handy & Harman is the parent company of the following PRPs, for which it has executed this agreement:

American Chemical & Refining Company, Inc.
Camdel Metals Corp.
Handy & Harman Tube Co., Inc.
Maryland Specialty Wire, Inc.

AR300071

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Donald B. Hohnstine
[Signature]

4/15/96
Date

Print Name: Donald B. Hohnstine

Title: VP Finance
Hargro Flexible Packaging Corp.

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

D Kevin Earp
[Signature]

4-11-96
Date

Print Name: D Kevin Earp

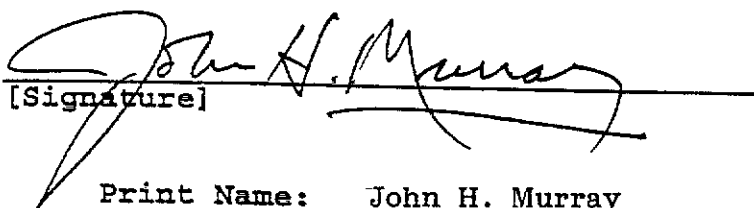
Title: Health and Safety Specialist

AR300073

ORIGINAL
(Red)

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/15/96
Date

Print Name: John H. Murray

Title: Attorney for Chesapeake Bay Maritime Museum

AR300074

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Lynn Y. Buhl
[Signature]

4/15/96
Date

Print Name: Lynn Y. Buhl

Title: Senior Staff Counsel, Chrysler Corporation

AR300075

CLARCOR - J. L. Clark
- Clark Filter
- Stone Container

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

David J. Lindsay
[Signature]

4-14-96
Date

Print Name: DAVID J. LINDSAY

Title: VP + CHIEF ADMINISTRATIVE OFFICER

AR300076

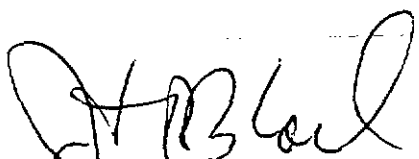
ORIGINAL
(Red)

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

April 9, 1996
Date

Print Name: Jonathan R. Black

Title: Vice President/General Counsel

Respondent: Clean Harbors (ChemClear of Baltimore, Inc. and
Potomac Development)

AR300077

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Aram J. Farnsworth
[Signature]

4/16/96
Date

Print Name: ARAM FARNATHORIAN

Title: CPEL. MGR.


Cargoleum Corporation

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

APRIL 17, 1996
Date

Print Name: PETER J. ROHRBACHER

Title: SENIOR VICE PRESIDENT OF ENGINEERING

AR300079

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Robert W. Teets
[Signature]

4-14-96
Date

Print Name: Robert W. Teets

Title: Vice President, Environmental Affairs & Risk Management

Company: Cooper Industries, Inc. (on behalf of Wagner Lighting)

AR300080

CSX Transportation, Inc.

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Anthony L. Braden
[Signature]

April 16, 1996
Date

Print Name: Anthony L. Braden

Title: Senior Director-Environmental

AR300081

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Joanne M Scanlon
[Signature]

4/16/96
Date

Print Name: Joanne M Scanlon

Title: Counsel, Delmarva Power + Light Company

AR300082

Deluxe Corporation

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Robert A. Jeras
[Signature]

4-17-96
Date

Print Name: ROBERT A. JERAS

Title: ENVIRONMENTAL REMEDIATION COORDINATOR

AR300083

APR 9 4 1996

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

James D. Rhoads
[Signature]

4/16/96
Date

Print Name: James D. Rhoads

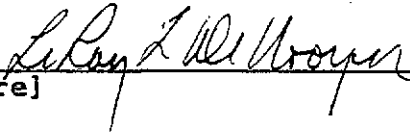
Title: Vice President, Engineering & Operations
DORMA Door Controls Inc.

AR300084

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]



April 9, 1996
Date

Print Name: LeRoy L. DeNooyer

Title: Senior Attorney
Dresser Industries, Inc. (Wayne, Pump & Dresser-Rand)

AR300085

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Guy V. Johnson
[Signature]

4/10/96
Date

Print Name: GUY V. JOHNSON

Title: SENIOR COUNSEL

ADMINISTRATIVE ORDER ON CONSENT
FOR REMEDIAL INVESTIGATION / FEASIBILITY STUDY


FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Eastman-Kodak Film Division Inc.

5461 Mt Holly Rd

New Market To Plainsboro MD 21631


[Signature]

4-15-96
Date

Print Name: *Robert A. Bernardos Jr.*

Title: *Pres.*

AR300087

Original
(Ref)

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

EG+G Pressure Science, Inc

[Signature]

John L. Healy, Senior Atty.

Date

4-16-96

Print Name:

John L. Healy

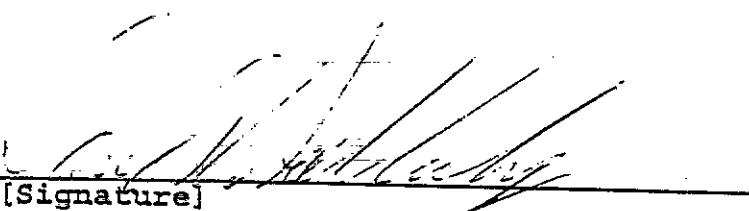
Title:

Senior Attorney

AR300088

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]4/15/96
Date

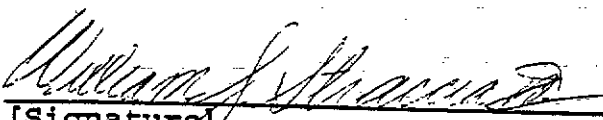
Print Name: David R. Sollenberger

Title: President

AR300089

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/12/96

Date

Print Name: William J. Straccia III

Title: President

Electro-Space Fabricators, Inc.
300 West High St.
Topton, PA 19562

AR300090

Elge-MASION MACHINING, INC.

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]



April 12, 1996
Date

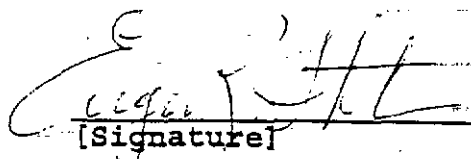
Print Name: Hermann R. Pfisterer

Title: Vice President

AR300091

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature] 4/15/96
Date

Print Name: Eugene A. STRICKER

Title: PRESIDENT - ENVIRONMENTAL CHEMICAL ASSOCIATES, INC.

AR300092

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Daniel J. McCabe
[Signature]

4/8/96
Date

Print Name: Daniel J. McCabe

Title: President

AR300093

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

On behalf of Fleetwood Motor Homes of Pennsylvania, Inc.

Robert W. Graham
[Signature]

4-17-96
Date

Print Name: Robert W. Graham

Title: V.P. Administration & H.R.

AR300094

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

EMC CORPORATION

Robert T. Forbes

[Signature]

4/10/96

Date

Print Name: *Robert T. Forbes*

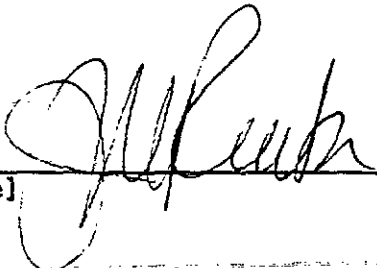
Title: *Director, Remediation*

AR300095

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]



APR 16 1996

Date

Print Name: J. M. Pintamaki
Assistant Secretary

Title: _____

FORD ELECTRONICS & REFRIGERATION CORPORATION

AR300096

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

APR 16 1996
Date

Print Name: _____

Title: _____
Assistant Secretary

FORD MOTOR COMPANY

AR300097

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Frederick Electronics Corporation

D. A. Gaudreau 4/15/96
[Signature] Date

Print Name: Daniel A. Gaudreau

Title: President and Chief Financial Officer

AR300098

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

✓
[Signature]

G.F. Carruthan

5/6/96
Date

Print Name: Geoffrey Carruthan

Title: Environmental Counsel

AR300099

Garden State Tanning

SIGNAL
Recd

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Chris L. Ehret

[Signature]

4/16/96

Date

Print Name:

Chris L. Ehret

Title:

Corp. Environmental Director

AR300100

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

GENERAL MOTORS CORPORATION

Don A. Schiemann
[Signature]

April 23, 1996
Date

Print Name: Don A. Schiemann

Title: Attorney

AR300101

Hazco

ORIGINAL
(100)

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

4/22/90
Date

Print Name:

ANDREW S. LEVINE

Title:

CAMP ENVIRONMENTAL COUNSEL
HAZCO

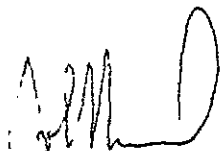
AR300102

SPECTRON, INC. SITE
EPA Docket No. 111-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:



[Signature]

April 16, 1996
Date

Print Name: John F. Leonard

Title: President and CEO

Henson Aviation
(dba Piedmont Airlines, Inc.)

AR300103

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

HERCULES INCORPORATED

[Signature]

Date

15 April 1996

Print Name: MARSHALL STEINBERG, Ph.D.

VICE PRESIDENT

Title: HEALTH & ENVIRONMENT

AR300104

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Hertz Equipment Rental Corporation,
a wholly-owned subsidiary of
The Hertz Corporation

[Signature]

April 16, 1996
Date

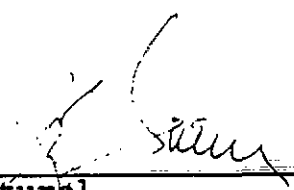
Print Name: Daniel I. Kaplan

Title: President

AR300105

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]


Date

Print Name: J. K. Guerin

Title: Senior Counsel, IBM Corp.

AR300106

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Edward H. Pappas
[Signature]

4/16/96
Date

Print Name: EDWARD H. PAPPAS

Title: PRESIDENT

BY: 

NEIL E. LAND, ATTORNEY

AR300107

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Susan M. Dacey
[Signature]

4/16/96
Date

Print Name: Susan M. Dacey
Title: G.M. / Secretary

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Michael G. Doucet
[Signature]

4/10/96
Date

Print Name: MICHAEL G. DOUCET

Title: VICE PRESIDENT - FINANCE

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Jan D. Ferguson
[Signature]

4/16/96
Date

Print Name:

Jan D. Ferguson

Title:

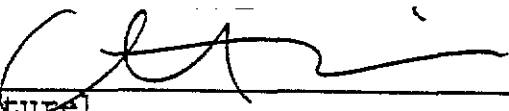
President

AR300110

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

JAMES RIVER CORPORATION


[Signature]

4/17/96
Date

Print Name: CYNTHIA V. BAILEY

Title: ASSOCIATE GENERAL COUNSEL, REGULATORY

AR300111


Kirker Enterprises, Inc.
F.K.J. Kirker Chemical Corp.

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/26/96
Date

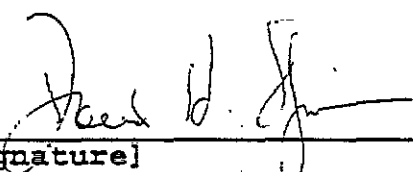
Print Name: Mark S Smith

Title: Senior Vice President

AR300112

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature] _____ Date 4/15/96

Print Name: David H. Shipman
Title: Vice President Finance
Kurz-Hausman, Inc.

AR300113

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

LAIDLAW ENVIRONMENTAL SERVICES (TS), INC.
f.k.a. GSX SERVICES, INC.


[Signature]

April 10, 1996
Date

Print Name:

HENRY H. TAYLOR

Title:

SECRETARY

AR300114

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
f.k.a. NORTH EAST SOLVENTS, INC.


[Signature]

April 10, 1996
Date

Print Name: HENRY H. TAYLOR

Title: SECRETARY

AR300115

Leindis, Div. of Western
Atlas Inc.

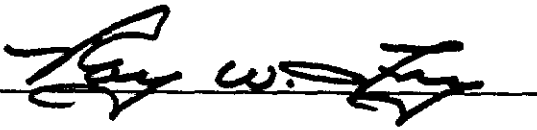
SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]



APRIL 10, 1996

Date

Print Name: RAY W. FRY

Title: VICE PRESIDENT - MANUFACTURING

AR300116

FOR THE RESPONDENTS:

Leeds + Northrup

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

Date

Print Name:

Lynne J. Tomeny

Title:

Counsel

AR300117

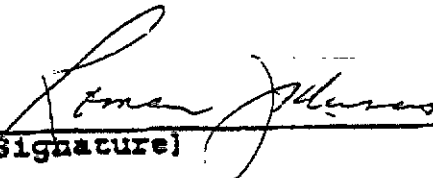
Lilly Industries, Inc

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

April 18, 1996
Date

Print Name: Roman J. Klusas

Title: V.P. & C.F.O.

AR300118

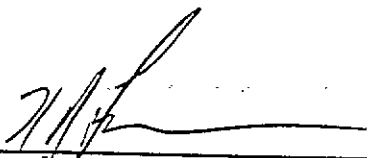
Lifton Systems, Inc.
Poly-Scientific Div.

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/16/96
Date

Print Name:

K. R. THOR

Title:

V.P., FINANCE & ADMINISTRATION

AR300119

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/16/96
Date

Print Name: Roy J. Femenella

Title: Global Engineering & Safety Operations Director

Respondent: Lucent Technologies Inc. For and in
Place of AT&T Technologies Inc.
(Western Electric)

AR300120

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Arnold S. Block
[Signature]

4/16/96
Date

Print Name: Arnold S. Block, Esquire

Title: Attorney for MABruder & Sons, Inc.

AR300121

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Michael F. McBride
[Signature]

May 15, 1996
Date

Print Name: MICHAEL F. MCBRIDE

Title: ITS ATTORNEY

AR300122

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

FOR MERCK & CO., INC.

Robert W Hyde Jr.

[Signature]

4/11/96
Date

Print Name: Robert W Hyde Jr

Title: Assistant Counsel - Environmental Law

AR300123

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Charles Garland

[Signature]

4/29/96

Date

Print Name: Charles Garland

Title: Vice President/Chief Eng., Metro Machine Corp.

AR300124

Monsanto ORIGINAL

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Michael R. Foresman /m 4/15/96
[Signature] Date

Print Name: MICHAEL R. FORESMAN
Title: Director, Remedial Projects

AR300125

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Risa H. Weinstock

[Signature]

4/12/96

Date

Print Name: Risa Weinstock

Title: Senior Counsel

AR300126

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

Date

Print Name:

Title:

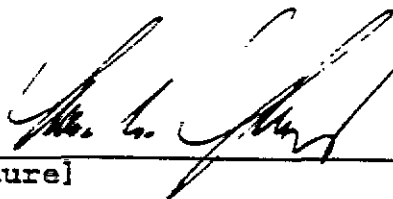
AR300127

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:



[Signature]

April 8, 1996
Date

Print Name:

HANNO U. SPRINGER

Title:

President

AR300128

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

CJ Wehrmeister
[Signature]


4/16/96
Date

Print Name: C. J. Wehrmeister

Title: Assistant Vice President -
Safety and Environmental

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

April 15, 1996
Date

Print Name: Larry R. Goode

Title: State Highway Administrator
North Carolina Department of Transportation

AR300130

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4-15-96
Date

Print Name: Keith C. McDole

Title: Vice President & General Counsel

AR300131

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Mason P. Oglesby 4/15/96
[Signature] Date

Print Name: Mason P. Oglesby

Title: President

Oglesby Construction, Inc.

AR300132

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Opti-Ray, Inc.

Peter J. Schultz
[Signature]

4-11-96
Date

Print Name: PETER J. SCHULTZ

Title: DIRECTOR, ENVIRONMENTAL AFFAIRS
Newell Co.

AR300133

FOR THE RESPONDENTS: OWENS-ILLINOIS, INC., on behalf of itself and its
present and former affiliates and subsidiaries

The undersigned hereby certifies that he or she is authorized to
execute this Consent Order on behalf of the Respondent for whom he
or she is signing and to bind such Respondent to the terms and
conditions herein:

[Signature]



April 11, 1996
Date

Print Name: H. G. BRUSS

Title: ASSISTANT SECRETARY

AR300134

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

V. Christodoulou 4/16/96
[Signature] Date

Print Name: V. CHRISTODOULOU
Title: VICE PRESIDENT

Penn Engineering

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Kenneth A. Jansson
[Signature]


4/17/76
Date

Print Name: KENNETH A. JANSSTROM
Title: PRESIDENT

AR300136

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/12/96
Date

Print Name: Doug Hart
Title: Environmental Specialist

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

4/22/96
Date

Print Name: John W. Noble, Esq.

Title: Attorney for Perdue Farms Incorporated

AR300138

Permacel

OR-00001
(100)

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Richard H. Chow 4/16/96
[Signature] Date

Print Name: Richard H. Chow

Title: Vice President, Technology and Manufacturing

AR300139

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Mary E. Dinker
[Signature]

4/15/96
Date

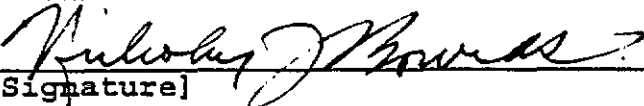
Print Name: MARY E. DINKER

Title: DIRECTOR, ENVIRONMENTAL, SAFETY & HEALTH

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

PRIOR COATED METALS, INC.


[Signature]

5/14/96
Date

Print Name: NICHOLAS J. BOURAS

Title: PRESIDENT

AR300141

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Reliance Electric Company and its
wholly owned subsidiary, Reliance
Electric Industrial Company for
itself and as successor-in-interest
to Lionville Manufacturing Company

Robert K. Beck

[Signature]

April 9, 1996

Date

Print Name: Robert K. Beck

Title: Assistant General Counsel

Rockwell International Corporation*

*Reliance Electric Company is a wholly owned subsidiary of Rockwell International Corporation

AR300142

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Jerrold Blair
[Signature]

4/15/96
Date

Print Name: Jerrold Blair

Title: Authorized Representative for RESOURCE RECOVERY MTD-SOUTH, INC.

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

RHI Holdings, Inc., as successor in interest to Rexnord Automation

Donald E. Miller April 10, 1996
[Signature] Vice President Date

Print Name: Donald E. Miller

Title: Vice President

AR300144

FOR THE RESPONDENTS: Rhone-Poulenc Inc. (for Rhone-Poulenc Inc. and Manchem Inc.)

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Rhone-Poulenc Inc. and Manchem Inc.
By: John M. Iatesta
[Signature]

April 16, 1996
Date

Print Name: John M. Iatesta

Title: Senior Corporate Counsel and Ass't Secretary

AR300145

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

LB
By: x

[Signature]

4/15/96
Date

Print Name: John E. Nine

Title: Vice-President
Schering Corporation

AR300146

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Gerald A. Fromm
[Signature]

4-11-96
Date

Print Name: GERALD A. FROMM

Title: TREASURER - SCHLEGEL CORP.

AR300147

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Richard J. Clin
[Signature]

5/10/96
Date

Print Name: Richard Clin
Title: General Manager, Dover Operations
for Scott Paper Company
Kimberly-Clark Corporation

AR300148

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Louis E. Stellato 4/13/96
[Signature] Date

Print Name: Louis E. Stellato

Title: Vice President, General Counsel & Secretary

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

David M. Wassum
[Signature]

4/16/96
Date

Print Name: David M. Wassum

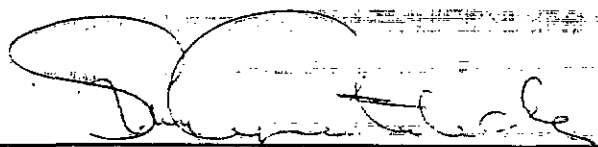
Title: Director, Regulatory Affairs

AR300150

Date
1/1/86

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/10/86
Date

Print Name: STEVEN APOSTOLIDES

Title: PRESIDENT - SILICON TRANSISTOR CORP.

AR300151

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Donald F. Parman
[Signature]

April 15, 1996

Date

Print Name: Donald F. Parman

Title: Vice President and Associate General Counsel
SmithKline Beecham Corporation

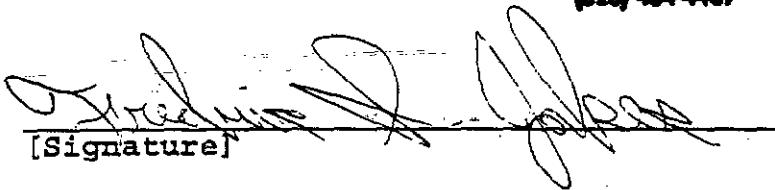
AR300152

Original
(used)

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

SOLVENTS & PETROLEUM SERVICE, INC.
1405 BREWERTON ROAD
SYRACUSE, NEW YORK 13208
(315) 454-4467


[Signature]

4/5/96
Date

Print Name: FREDRIC S. JAKES

Title: PRESIDENT

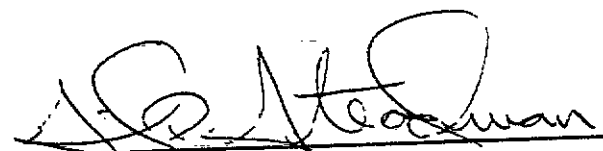
AR300153

Southchem Inc.

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4-12-96
Date

Print Name: G.D. Steadman

Title: PRESIDENT

AR300154

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

SPRAY PRODUCTS CORPORATION

Andrew A. Orr
[Signature]

APRIL 10, 1996
Date

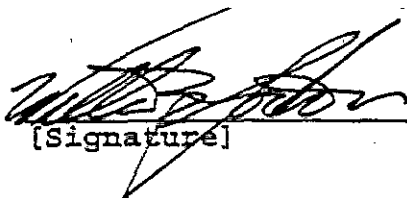
Print Name: ANDREW A. ORR

Title: PRESIDENT

AR300155

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/15/96
Date

Print Name: William B. Sordoni

Title: President

Respondent: Sterling Industrial Corp.

AR300156

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

K F Banks
[Signature]

4/15/96
Date

Print Name: Kevin F. Banks
Title: Vice President, Compound Manufacturing

AR300157

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Paul Burkhardt
[Signature]

4-15-96
Date

Print Name: Paul Burkhardt

Title: Environmental Manager

AR300158

- 1) Teledyne Amco
- 2) Teledyne Avionics
- 3) Teledyne Energy Systems
- 4) Teledyne Thermatics

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Mitchell E. Burack

[Signature]

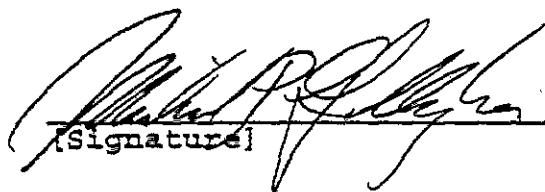
4/16/96
Date

Print Name: Mitchell E. Burack

Title: Outside Counsel

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]April 15, 1996
DateMRC
4/15/96Print Name: Michael P. GallagherTitle: Manager-Centralized Waste Site Management Group

AR300160

Textile Chemical Company, Inc
f.k.a. L.W. Ecken

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

H. E. Boyadjian
[Signature]

4/12/96
Date

Print Name: H. EDWARD BOYADJIAN

Title: V.P. FINANCE

AR300161

FOR THE RESPONDENTS: Textron Inc. (Spencer Kellogg / Textro Lycom)

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

Date

Print Name:

Title:

Janison Schiff

Environmental Counsel

AR300162

Thomasville Furniture Industries Inc

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Ronald G. Berrier
[Signature]

4/23/96
Date

Print Name: RONALD G. BERRIER

Title: VICE PRESIDENT, TREASURER


AR300163

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

41

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/15/96
Date

Print Name: Frederick L. Kerst

Title: Plant Manager

AR300164

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

George C. White
[Signature]

4/18/96
Date

Print Name: GEORGE C. WHITE

Title: VICE PRESIDENT OF CORPORATE SERVICES

TOWNSENDS, INC.

RT 24 EAST PO BOX 468
MILLSBORO DE 19966

DESIGNATED REPRESENTATIVE

ROBERT FALCZEWSKI

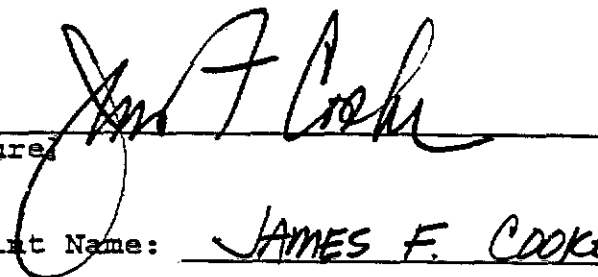
SAME ADDRESS AS ABOVE

PH: 302 934-4020

FX 302 934-4021

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

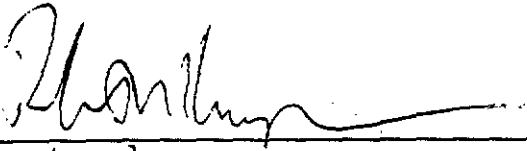
 4.11.96
[Signature] Date

Print Name: JAMES F. COOKE

Title: CORP. MANAGER REAL ESTATE & FACILITIES

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:



[Signature]

04/11/96

Date

Print Name: Robert M. Kaye

Title: Executive Vice President

AR300167

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

TRW INC.

By: David B. Goldston
[Signature]

4/12/96

Date

Print Name: David B. Goldston

Title: Assistant Secretary, TRW Inc.

AR300168

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

UNION CARBIDE CORPORATION

Arthur M. McClain
[Signature]

April 10, 1996
Date

Print Name: Arthur M. Mc Clain

Title: Associate Director Environmental Affairs

AR300169

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

UNITED CONTAINER MACHINERY



[Signature]

4/15/96
Date

Print Name: A. V. TORRE
Title: V.P. MANUFACTURING

AR300170

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Richard E. Kohler
[Signature]

4-16-96
Date

Print Name: RICHARD E. KOHLER

Title: PLANT MANAGER

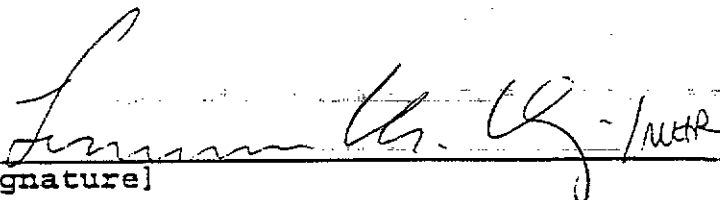
UNITED CONTAMINATION CONTROL

4/30/96

AR300171

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature] 4/16/96
Date

Print Name: Lawrence M. Nagin

Title: Executive Vice President Corporate Affairs and General Counsel

USAjr, Inc. on behalf of Piedmont Airlines

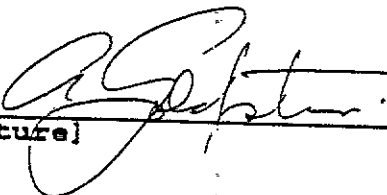
AR300172

VENTURE CHEMICAL, INC.
PO BOX 88
ADELPHIA, NJ 07710

SPECTRON, INC. SITE
EPA Docket No. III-96-15-DC

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature] 4/16/96
Date
Print Name: A. Goldstein
Title: President

VENTURE CHEMICAL, INC.
PO BOX 88
ADELPHIA, NJ 07710

AR300173

Virginia Power

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

James P. O'Hanlon 4/17/96
[Signature] Date

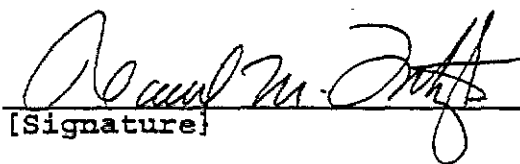
Print Name: James P. O'Hanlon

Title: Sr. Vice-President, Nuclear

AR300174

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4-16-96
Date

Print Name: DAVID M. LATZKO

Title: ATTORNEY

ON BEHALF OF

W.L. GORE & ASSOCIATES, INC.

AR300175

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

[Signature]

W. LEE THOMAS

Date

APRIL 9, 1996

Print Name:

WARD MACHINERY COMPANY

Title:

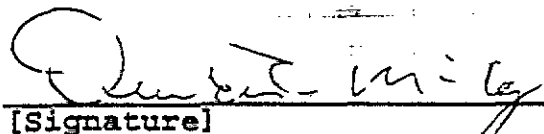
DIRECTOR / ATTORNEY

AR300176

Witek Corporation

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

4/23/96

Date


Print Name: Dustan E. McCoy

Title: Vice President, General Counsel and Corporate Secretary

AR300177

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:


[Signature]

April 15, 1996
Date

Print Name: Harry E. Whaley

Title: President, Woodstream Corporation

AR300178

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Charles G. Rupp 4/12/96
[Signature] Date

Print Name: Charles G. Rupp
Title: Vice President

AR300179

FOR THE RESPONDENTS:

The undersigned hereby certifies that he or she is authorized to execute this Consent Order on behalf of the Respondent for whom he or she is signing and to bind such Respondent to the terms and conditions herein:

Paul Yeagle 4/19/96
[Signature] Date
Print Name: PAUL YEAGLE
Title: President

Appendix A

Galaxy/Spectron Group

ADMINISTRATIVE ORDER BY CONSENT - RESPONDENTS

Company Name

AIR PRODUCTS AND CHEMICALS, INC.
AKZO NOBEL COATINGS IND.
ALCOLAC, INC.
ALLIEDSIGNAL, INC.
AMERICAN INSULATED WIRE CORP.
AMERICAN MACHINE & TOOL CO., INC.
AMETEK INC.
ARCS FABRICATORS, INC.
ARMSTRONG WORLD INDUSTRIES, INC.
ATLANTIC AVIATION CORPORATION
AVM/MAREMONT
BALL CORPORATION
BEAZER EAST, INC.
BEST FOODS, DIV. OF CPC INTERNATIONAL
BIOCRAFT LABORATORIES, INC.
BIO WHITTAKER, INC.
BORDEN, INC.
BP AMERICA INC. (DORR-OLIVER)
BRISTOL-MYERS SQUIBB FAMILY OF COMPANIES
BRUNING PAINT COMPANY
CAMBRIDGE, INC., f.k.a. CAMBRIDGE WIRE CLOTH COMPANY
CARPENTER CO.
CDI DISPERSIONS
CENTRAL PIEDMONT COMMUNITY COLLEGE
CHESAPEAKE BAY MARITIME MUSEUM
CHRYSLER CORPORATION
CLARCOR
J.L. CLARK, CLARK FILTER, STONE CONTAINER
CLEAN HARBORS
CHEMCLEAR OF BALTIMORE, INC. AND POTOMAC DEVELOPMENT
COATING SYSTEMS, INC.
CONGOLEUM CORPORATION
COOPER INDUSTRIES, INC., ON BEHALF OF WAGNER LIGHTING
CSX TRANSPORTATION, INC.
DELMARVA POWER & LIGHT COMPANY
DELUXE CORPORATION
DORMA DOOR CONTROLS INC.
DRESSER INDUSTRIES, INC. (WAYNE, PUMP & DRESSER-RAND)
DUPONT
EASTERN SHORE FUEL INJECTION INC.
EG&G PRESSURE SCIENCE, INC.
ELECTRO-PLATERS OF YORK, INC.
ELECTRO-SPACE FABRICATORS, INC.
ELGE PRECISION MACHINING, INC.
ENVIRONMENTAL CHEMICAL ASSOCS., INC.
ENVIRONMENTAL ENTERPRISES INCORPORATED
FLEETWOOD MOTOR HOMES OF PENNSYLVANIA, INC.

AR300181

FMC CORPORATION
 FORD ELECTRONICS & REFRIGERATION CORPORATION
 FORD MOTOR COMPANY
 FREDERICK ELECTRONICS CORPORATION
 GAF CORPORATION
 GARDEN STATE TANNING
 GENERAL MOTORS CORPORATION
 GLASTRON, INC.
 GOODYEAR TIRE & RUBBER COMPANY (THE)
 GTE OPERATIONS SUPPORT INCORPORATED
 GTE PRODUCTS, GTE SYLVANIA INCORPORATED, SYLVANIA ELECTRIC
 PRODUCTS INCORPORATED
 HALSTEAD INDUSTRIES, INC.
 HANDY & HARMAN FOR AMERICAN CHEMICAL & REFINING COMPANY, INC.,
 CAMDEL METALS CORP., HANDY & HARMAN TUBE CO., INC.,
 MARYLAND SPECIALTY WIRE, INC.
 HARGRO FLEXIBLE PACKAGING CORPORATION
 HAZCO
 HENSON AVIATION, dba PIEDMONT AIRLINES, INC.
 HERCULES INCORPORATED
 HERTZ EQUIPMENT RENTAL CORPORATION, a wholly-owned subsidiary of
 THE HERTZ CORPORATION
 IBM CORP.
 IMPERIAL SPECIALTY, INC.
 INDUSTRIAL POLYMERS & CHEMICALS, INC.
 J.B. SLEVIN CO., INC.
 J.W. FERGUSON & SONS, INC.
 JAMES RIVER CORPORATION
 KIRKER ENTERPRISES, f.k.a. KIRKER CHEMICAL CORP.
 KURZ-HASTINGS, INC.
 LAIDLAW ENVIRONMENTAL SERVICES (TS) INC., f.k.a. GSX SERVICES,
 INC.
 LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST) INC., f.k.a. NORTH
 EAST SOLVENTS, INC.
 LANDIS, DIVISION OF WESTERN ATLAS INC.
 LEEDS & NORTHRUP
 LILLY INDUSTRIES, INC.
 LITTON SYSTEMS, INC., POLY-SCIENTIFIC DIVISION
 LUCENT TECHNOLOGIES, INC. FOR AND IN PLACE OF AT&T TECHNOLOGIES,
 INC. (WESTERN ELECTRIC)
 MA BRUDER & SONS, INC.
 MARISOL, INC.
 MERCK & CO., INC.
 METRO MACHINE CORPORATION
 MONSANTO COMPANY
 MSSC COMPANY (MAGNAVOX SIGNAL SYS. CO.)
 NATICO/NACCON, INC.
 NETZSCH INCORPORATED
 NORFOLK AND WESTERN RAILWAY COMPANY
 NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
 OCCIDENTAL CHEMICAL CORPORATION
 OGLESBY CONSTRUCTION, INC.
 OPTI-RAY, INC.

OWENS-ILLINOIS, INC., ON BEHALF OF ITSELF AND PRESENT/FORMER
AFFILIATES AND SUBSIDIARIES
PENICK CORPORATION
PENN ENGINEERING
PENNEX ALUMINUM COMPANY
PERDUE FARMS INCORPORATED
PERMACEL
PRE FINISH METALS
PRIOR COATED METALS, INC.
RELIANCE ELECTRIC COMPANY AND ITS WHOLLY-OWNED SUBSIDIARY,
RELIANCE ELECTRIC INDUSTRIAL COMPANY FOR ITSELF AND
SUCCESSOR-IN-INTEREST TO LIONVILLE MANUFACTURING COMPANY
RESOURCE RECOVERY MID-SOUTH, INC.
RHI HOLDINGS, SUCCESSOR-IN-INTEREST TO REXNORD AUTOMATION
RHONE-POULENC INC.
RHONE-POULENC AND MANCHEM, INC.
SCHERING CORPORATION
SCHLEGEL CORPORATION
SCOTT PAPER COMPANY (KIMBERLY-CLARK CORPORATION)
SHERWIN-WILLIAMS COMPANY (THE)
SICPA SECURINK CORPORATION
SILICON TRANSISTOR CORPORATION
SMITHKLINE BEECHAM CORPORATION
SOLVENTS & PETROLEUM SERVICE, INC.
SOUTHCHEM INC.
SPRAY PRODUCTS CORPORATION
STERLING INDUSTRIAL CORP.
SYNERGISTICS INDUSTRIES (NJ) INC., f.k.a. CARY CHEMICALS
TATE ACCESS FLOORS, INC.
TELEDYNE AMCO, TELEDYNE AVIONICS, TELEDYNE ENERGY SYSTEMS,
TELEDYNE THERMATICS
TEXACO INC.
TEXTILE CHEMICAL COMPANY, INC., f.k.a. R.W. EAKEN, INC.
TEXTRON INC.
SPENCER-KELLOGG/TEXTRON LYCOMING
THOMASVILLE FURNITURE INDUSTRIES, INC.
TIDEWATER PUBLISHING CORP.
TOWNSENDS, INC.
TOYOTA MOTOR SALES, U.S.A., INC.
TRIANGLE SIGN & SERVICE
TRW INC.
UNION CARBIDE CORPORATION
UNITED CONTAINER MACHINERY
UNITED CONTAMINATION CONTROL
USAIR, ON BEHALF OF PIEDMONT AIRLINES
VENTURE CHEMICAL, INC.
VIRGINIA POWER
W.L. GORE & ASSOCIATES, INC.
WARD MACHINERY COMPANY
WITCO CORPORATION
WOODSTREAM CORPORATION
Y.E.P. INDUSTRIES, INC.
YORK TAPE AND LABEL COMPANY

TABLE A

A. 1985 and 1987 Maryland Department of the Environment (MDE) sample results showing levels of contaminated liquids within containment dikes onsite:

a) Methylene chloride (MeCL)	-	19,200 and 1760 ppm
b) Trichloroethylene (TCE)	-	299,400 and 63 ppm
c) 1,1,1-Trichloroethane (111-TCA)	-	227,800 and 638 ppm
d) Toluene (TOL)	-	4,200 and 35 ppm
e) Methyl ethyl ketone (MEK)	-	1,700 and 79 ppm
f) Acetone (ACE)	-	203 and 363 ppm

(ppm = parts per million)

B. 1985 MDE sample results showing levels of contamination in seepage along the streambank onsite.

a) MeCL	-	4630 ppm	d) TOL	-	27 ppm
b) TCE	-	22 ppm	e) MEK	-	363 ppm
c) 111-TCA	-	596 ppm	f) ACE	-	2,260 ppm

C. 1985 through 1988 MDE sample results showing levels of MeCL in Little Elk Creek at and below the Site.

Date	NDpstream	Midstream 1	Midstream 2	Downstream
02/23/88	<1 ppb	678 ppb	1165 ppb	146 ppb
10/07/87	<1 ppb	2000 ppb	2100 ppb	71 ppb
08/01/86	<1 ppb	13000 ppb	12000 ppb	9 ppb
11/01/85	<1 ppb	2900 ppb	2650 ppb	100 ppb

(ppb = parts per billion)

D. 1989 Chemical Waste Management (CWM) sample results showing levels of contamination in Little Elk Creek at and below the Site.

	NDpstream	Midstream 1	Midstream 2	Downstream
MCL	ND	548.0 ppb	537.0 ppb	59.2 ppb
TCE	ND	7.8 ppb	8.4 ppb	ND
TOL	ND	15.0 ppb	18.3 ppb	ND
111-TCA	ND	92.6 ppb	17.0 ppb	8.1 ppb
PCE	ND	18.8 ppb	19.8 ppb	1.6 ppb

TABLE A (Cont'd)

E. 1989 CWM sample results showing levels of contamination in seepage along the streambank on-site.

	<u>Seep 1</u>	<u>Seep 2</u>	<u>Seep 3</u>	<u>Seep 4</u>
MeCL	10,800 ppm	296 ppm	20 ppm	ND
TCE	ND	0.6 ppm	8.1 ppm	ND
TOL	15 ppm	8.4 ppm	12 ppm	ND
111-TCA	605 ppm	73 ppm	92 ppm	109 ppm
PCE	ND	5.8 ppm	11 ppm	12.4 ppm

Seeps 1, 2, and 3 onsite. Seep 4 is downstream/offsite.
(PCE=Tetrachloroethylene)

(Although no MeCL, TCE, or TOL was detected in Seep 4, sample analyses showed significant levels of other hazardous substances.)

(ND=not detected)

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